

FORM ADV PART 2A DISCLOSURE BROCHURE



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This brochure provides information about the qualifications and business practices of 360 IRA. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 636-896-4052. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about 360 IRA (CRD #289783) is available on the SEC's website at www.adviserinfo.sec.gov

MARCH 6, 2025

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

Since the last filing of this brochure on March 25, 2024, the following has been updated:

- Item 4 client assets under management has been updated.
 - Ownership information has been updated in Item 4.
 - Item 5 Financial Planning fees have been updated.
 - Item 5 Third Party Money Managers have been updated to remove Gradient.
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Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

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Item 4: Advisory Business

Firm Description

360 Investment and Retirement Advisory, LLC DBA 360 IRA ("360") was founded in 2012 and became an independent Registered Investment Advisor in 2017. 360 is owned by Fin ED Services Group LLC. Jeremiah "Jeremy" North is Chief Compliance Officer.

360 is a fee-based financial planning and investment management firm. Affiliated representatives of 360 also sell insurance products. Insurance products will not be offered to clients unless the person(s) is appropriately licensed to sell insurance products in the applicable jurisdiction.

360 does not act as a custodian of Client assets.

An evaluation of each Client's initial situation is provided to the Client, often in the form of a net worth statement, risk analysis or similar document. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the Client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, tax preparers, insurance agents, etc.) are engaged directly by the Client on an as-needed basis and may charge fees of their own. Conflicts of interest will be disclosed to the Client in the event they should occur.

If a client has not received a copy of this brochure at least 48 hours prior to signing an agreement, the client has five (5) business days in which to cancel the agreement, without penalty.

Types of Advisory Services

ASSET MANAGEMENT

360 offers discretionary asset management services to advisory Clients. 360 will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize 360 discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

FINANCIAL PLANNING AND CONSULTING

If financial planning services are applicable, a thorough review of all applicable topics including but not limited to, Investments, Taxes, Qualified Plans, Insurance, Retirement Income, and Social Security will be reviewed. If a conflict of interest exists between the interests of 360 and the interests of the Client, the Client is under no obligation to act upon 360's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through 360. Financial plans will be completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation.

THIRD PARTY MANAGERS

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

After gathering information about your financial situation and objectives, an Associated Person of our firm will make recommendations regarding the suitability of a TPM or investment style based on, but not limited to, your financial needs, investment goals, tolerance for risk, and investment objectives. Upon selection of a TPM(s), we will monitor the performance of the TPM(s) to ensure their performance and investment style remains aligned with your investment goals and objectives.

In such circumstances, we receive referral fees from the TPM. We act as the liaison between the Client and the TPM in return for an ongoing portion of the advisory fees charged by the TPM. We helps the Client complete the necessary paperwork of the TPM, provides ongoing services to the Client, will provide the TPM with any changes in Client status as provided to us by the Client and review the quarterly statements provided by the TPM. We will deliver the Form ADV Part 2, Privacy Notice and Disclosure Statement of the TPM. Clients placed with TPMs will be billed in accordance with the TPM's Fee Schedule which will be disclosed to the Client prior to signing an agreement. This is detailed in Item 10 of this brochure.

Prior to introducing any Pennsylvania clients to another investment advisor, 360 will be responsible in determining:

- a. Whether the IA is registered with the Department of Banking and Securities under Section 301 of the Pennsylvania Securities Act of 1972 ("1972 Act");
- b. Whether the IA is relying on an exclusion from the definition of investment adviser under Section 102(j) of the 1972 Act;
- c. Whether the IA is relying on an exemption from registration under Section 302(d) of the 1972 Act; or
- d. When the IA is registered with the Securities and Exchange Commission, and whether it has filed a Notification Filing with this Department under Department Regulation 303.015(a).

SEMINARS AND WORKSHOPS

360 holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

Wrap Fee Programs

360 does not sponsor any wrap fee programs.

Client Assets Under Management

360 has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0	\$0	12/31/2024

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule**ASSET MANAGEMENT**

360 offers discretionary direct asset management services to advisory Clients. 360 charges an annual investment advisory fee based on the total assets under management of no more than 1%.

The annual fee may be negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.). Fees are billed quarterly in arrears based on the amount of assets managed as of the close of business on the last business day of the previous quarter. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. Clients may terminate advisory services with thirty (30) days written notice. For accounts opened or closed mid-billing period, any unpaid earned fees will be due to 360 based on a pro-rata fee for the days service was provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

For fees that are directly deducted from the account by the custodian:

- 360 will provide the Client with an invoice prior to instructing the custodian to deduct the fee stating the amount of the fee, the formula used to calculate the fee, the amount of assets under management the fee is based on and the time period covered by the fee;
- 360 will obtain written authorization signed by the Client allowing the fees to be deducted; and
- The Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

FINANCIAL PLANNING AND CONSULTING

360 charges a fixed fee for financial planning. Prior to the planning process the Client will be provided an estimated plan fee. Services are completed and delivered inside of thirty (30) days. Client may cancel in writing within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to 360. 360 reserves the right to waive the fee should the Client implement the plan through 360.

FIXED FEES

Financial Planning Services are offered based on a flat fee between \$99 and \$10,000. Fees for financial plans are due upon delivery of the completed plan.

THIRD PARTY MANAGERS

The combination of fees for 360 and the TPM will not exceed the industry standard of excessive fees, which is 3% annualized.

Brookstone Capital Management, LLC CRD#141413

Brookstone Capital Management (BCM) offers a discretionary asset management program through sponsoring a wrap program which will be disclosed in their Appendix 1. Advisor will be compensated via a fee share from BCM to which it directs Clients. This relationship will be disclosed in the contract between Advisor and BCM.

Pursuant to an investment advisory contract signed by each Client, the Client will pay BCM a monthly Management/Wrap Program Fee, payable in arrears, based on the amount of the assets to be managed by the advisor as of the opening of business on the first business day of each month.

These fees cover (i) an initial analysis and periodic re-evaluation of the Client's investment objectives and needs, and discretionary allocation among portfolio managers, (ii) all advisory services, including fees of portfolio managers, (iii) account statements, (iv) execution, and (v) custody.

The Investment Advisor Representative who recommends the Program receives compensation as a result of a Client's participation in the program. The amount of this compensation may be more than what the advisory representative would receive if the program Client paid separately for investment advices, brokerage and other services. The IAR may therefore have a financial incentive to recommend the program over other programs and services. BCM may use both internal and external portfolio managers and they would receive between 1/3 and 1/2 of the BCM advisory fee. The use or non-use of a portfolio manager does not affect the fee a Client pays. Brookstone has multiple models and portfolios that fall under two different fee schedules. Clients will elect which models and portfolios to invest in and will pay a fee in accordance with the applicable fee schedule as outlined below:

Fee Schedule I is for the following portfolios (breakpoints are per account):

Fee Schedule I			
Account Size	Maximum Annual Fee	BCM Fee	Advisor Retention
Up to \$500,000	1.50%	0.50%	1.00%
Next \$500,000	1.35%	0.45%	0.90%
\$1,000,000 and over	1.15%	0.40%	0.75%

Fee Schedule II is for the following portfolios (breakpoints are per account):

Fee Schedule II			
Account Size	Maximum Annual Fee	BCM Fee	Advisor Retention
Up to \$500,000	1.95%	0.95%	1.00%
Next \$500,000	1.75%	0.85%	0.90%
\$1,000,000 and over	1.50%	0.75%	0.75%

Fee Schedule III is for the following portfolios (breakpoints are per account):

Fee Schedule III	
Account Size	Advisor Retention
Up to \$500,000	1.00%
Next \$500,000	1.00%
Next \$1,000,000	1.00%

The Kaizen Hedged Premium Spreads Fund is an affiliated mutual fund with a separate internal expense ratio no greater than 1.85%

The Altruist Enhanced Income Fund and the MarketGrader 100 Enhanced Index Fund (managed by Kaizen) are affiliated mutual funds with separate internal expense ratios no greater than 1.50%.

Additionally, all accounts will be charged a monthly \$8 technology fee, subject to change based on the terms, conditions, and fees of providers. These fees will be deducted automatically from Client accounts and shall be used by BCM to utilize software to consolidate all accounts through a portfolio accounting system and create consolidated, on-demand performance reports.

The Client agrees to pay a fee monthly, in arrears, for the advisory services provided by BCM pursuant to this agreement. The fee will be calculated based on the value of the account on the last day of the month, prorated to the number of days the account is funded. The Client understands to the extent that the assets are allocated to mutual fund shares, exchange traded fund shares and unit investment trusts certain costs may be associated with the ownership of such shares as described in each prospectus. Certain services of the custodian may require the customer to pay cost in addition to the advisory fee paid to BCM. Client will be responsible for paying any transaction fees in the account that the Custodian charges. This includes overnight fees and any other transactions that the Custodian charges per their Institutional Fee Schedule. The Client agrees to be charged the above-referenced fees applicable with the Investment Account.

Fees may be negotiated by the advisor at the sole discretion of the advisor. Asset management fees will be automatically deducted from the Client account on a monthly basis by the custodian.

Clients may terminate their advisory contract with BCM, in whole or in part, by providing 30 days written notice. If the Form ADV Part 2 is not delivered at least forty-eight (48) hours before the Client enters into the contract, then the Client has the right to terminate

the contract within five (5) business days after entering into it without penalty. Upon termination, any fees paid in advance will be prorated to the date of the termination and any excess will be refunded to the Client. Client's advisory agreement with the Advisor is non-transferable without Client's written approval.

SEMINARS AND WORKSHOPS

360 does not charge a fee for attendance to these seminars.

Client Payment of Fees

Investment management fees are billed quarterly in arrears, meaning that we invoice you after the billing period. Fees are usually deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Fees for financial plans are due upon delivery of the completed plan. They will be billed:

- Check – to be remitted by Client to 360
- Electronic Payment via ACH, Debit Card, or Credit Card (fees will be paid via a third party payment processor in which the client will securely input payment information and pay the advisory fee through a secure portal. 360 will not have continuous access to the Client's banking information.)

360, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

Clients pay the TPM's investment advisory fees. Prior to signing an investment advisory agreement, the method of payment will be disclosed in the TPM's Form ADV Part 2.

Additional Client Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities, and exchange-traded funds. These charges may include mutual fund transaction fees, postage and handling and miscellaneous fees. For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

360 does not require any prepayment of fees of more than \$500 per Client and six months or more in advance.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to 360.

External Compensation for the Sale of Securities to Clients

360 does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of 360.

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

Sharing of Capital Gains

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

360 does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for 360 to recommend an investment that may carry a higher degree of risk to the Client.

Item 7: Types of Clients

Description

360 generally provides investment advice to individuals and high net worth individuals.

Client relationships vary in scope and length of service.

Account Minimums

360 does not require a minimum to open an account.

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

Methods of Analysis

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

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

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

TPMs utilized by 360 may use various methods of analysis to determine the proper strategy for the Client referred and these will be disclosed in the TPM's Form ADV Part 2. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns. Other strategies utilized by TPMs may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

In developing a financial plan for a Client, 360's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to 360. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases and short-term purchases.

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with 360:

- *Market Risk:* The prices of securities held by mutual funds in which Clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the Client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller

companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.

The risks associated with utilizing TPM's include:

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

Item 9: Disciplinary Information

Criminal or Civil Actions

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

Administrative Enforcement Proceedings

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

Self-Regulatory Organization Enforcement Proceedings

360 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 360 or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

No affiliated representatives of 360 are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither 360 nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Managing Member Jeremy North is also a licensed insurance agent. Approximately 25% of his time is spent in this practice. From time to time, he will offer Clients services from those activities.

Jeremy North is also CEO of US FEDS LLC where he provides benefits research and training for federal employees. Approximately, 25% of his time is spent in this business.

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

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

360 recommends the services of TPM's to manage Client accounts. In such circumstances, 360 receives referral fees from the TPM. 360 acts as the liaison between the Client and the TPM in return for an ongoing portion of the advisory fees charged by the TPM. 360 is responsible for:

- helping the Client complete the necessary paperwork of the TPM;
- providing ongoing services to the Client;
- updating the TPM with any changes in Client status which is provided to 360 by the Client;
- reviewing the quarterly statements provided by the TPM; and
- delivering the Form ADV Part 2, Privacy Notice and Disclosure Statement of the third party money manager to the Client.

Clients placed with TPM will be billed in accordance with the TPM's fee schedule which will be disclosed to the Client prior to signing an agreement. When referring Clients to a third party money manager, the Client's best interest will be the main determining factor of 360.

These practices represent conflicts of interest because 360 is paid a Referral Fee for recommending the TPM and may choose to recommend a particular TPM based on the fee 360 is to receive. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to act in the best interest of his Clients. Clients are not required to accept any recommendation of TPM given by 360 and have the option to receive investment advice through other money managers of their choosing.

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

Code of Ethics Description

The affiliated persons (affiliated persons include employees and/or independent contractors) of 360 have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of 360 affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of 360. The Code reflects 360 and its supervised persons' responsibility to act in the best interest of their Client.

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

360's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of 360 may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

360's Code is based on the guiding principle that the interests of the Client are our top priority. 360's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

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

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

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

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

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

360 and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide 360 with copies of their brokerage statements.

The Chief Compliance Officer of 360 is Jeremy North. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

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

360 does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide 360 with copies of their brokerage statements.

The Chief Compliance Officer of 360 is Jeremy North. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

360 will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. 360 will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. 360 relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by 360. 360 does not receive any portion of the trading fees.

360 will require the use of Charles Schwab.

- *Directed Brokerage*
360 does not allow directed brokerage accounts.
- *Best Execution*
Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.
- *Soft Dollar Arrangements*
The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by 360 from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. As permitted by Section 28(e) of the Securities Exchange Act of 1934, 360 receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of 360. These benefits include both proprietary research from the broker and other research written by third parties.

A conflict of interest exists when 360 receives soft dollars. This conflict is mitigated by the fact that 360 has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

360 utilizes the services of custodial broker dealers. Economic benefits are received by 360 which would not be received if 360 did not give investment advice to Clients. These benefits include: A dedicated trading desk, a dedicated service group and an account services manager dedicated to 360's accounts, ability to conduct "block" Client trades, electronic download of trades, balances and positions, duplicate and batched Client statements, and the ability to have advisory fees directly deducted from Client accounts.

Aggregating Securities Transactions for Client Accounts

360 is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of 360. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis.

Item 13: Review of Accounts

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

Persons Involved

Account reviews are performed quarterly by the Chief Compliance Officer of 360. Account reviews are performed more frequently when market conditions dictate. Financial Plans are considered complete when recommendations are delivered to the Client and a review is done only upon request of Client.

Review of Client Accounts on Non-Periodic Basis

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

Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by 360's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

Item 14: Client Referrals and Other Compensation

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

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

360 receives a portion of the annual management fees collected by the TPM(s) to whom 360 refers Clients.

This situation creates a conflict of interest because 360 and/or its Investment Advisor Representative have an incentive to decide what TPMs to use because of the higher referral fees to be received by 360. However, when referring Clients to a TPM, the Client's best interest will be the main determining factor of 360.

Advisory Firm Payments for Client Referrals

360 may, from time to time, enter into agreements with individuals and organizations ("referring party") that refer Clients to 360 in exchange for compensation. This activity will either be considered an endorsement or testimonial, depending on if the referring party is a Client of 360. For all Clients introduced by a referring party, 360 may pay that referring party a fee pursuant to a previously executed agreement. While the specific terms of each agreement may differ, the compensation will be based upon 360's engagement of new Clients and is calculated using a fixed fee, or a varying percentage of the fees paid to 360 by such Clients. Any such fee shall be paid solely from 360's investment management fee and shall not result in any additional charge to the Client. 360 ensures that referring parties are registered with all appropriate jurisdictions or exempt from registration as investment advisers or investment adviser representatives.

Each referred Client to 360 under such an arrangement will receive a copy of this brochure and a written disclosure clearly and prominently disclosing if the referring party is a current Client or investor, the compensation that will be paid by 360 to the referring party

and any material conflicts of interest. The referring party is required to provide this disclosure at the time the endorsement or testimonial is disseminated and will obtain the Client's signature acknowledging receipt of 360's disclosure brochure and the written disclosure.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by 360.

360 is deemed to have constructive custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of 360. If 360 is authorized or permitted to deduct fees directly from the account by the custodian:

- 360 will provide the Client with an invoice concurrent to instructing the custodian to deduct the fee stating the amount of the fee, the formula used to calculate the fee, the amount of assets under management the fee is based on and the time period covered by the fee;
- 360 will obtain written authorization signed by the Client allowing the fees to be deducted; and
- The Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

Item 16: Investment Discretion

Discretionary Authority for Trading

360 requires discretionary authority to manage securities accounts on behalf of Clients. 360 has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

360 allows Client's to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to 360 in writing.

360 has discretionary authority to determine the broker or dealer to be used for the purchase or sale of securities. The Client approves the custodian to be used and the commission rates paid to the custodian. 360 does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Item 17: Voting Client Securities

Proxy Votes

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

When assistance on voting proxies is requested, 360 will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because 360 does not serve as a custodian for Client funds or securities and 360 does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

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

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

Bankruptcy Petitions during the Past Ten Years

Neither 360 nor its management has had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State Registered Advisors

Education and business background, including any outside business activities for all management and supervised persons can be found in the Supplement to this Brochure (Part 2B of Form ADV Part 2).

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

None to report.

Item 1 Cover Page

SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Jeremiah “Jeremy” North, ChFEBCSM



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St. Charles, MO 63303

Tel: 636-896-4052
Fax: 844-436-0329

JNorth@360IRA.com

Website:
www.360IRA.com

This brochure supplement provides information about Jeremy North and supplements the 360 IRA's brochure. You should have received a copy of that brochure. Please contact Jeremy North if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Jeremy North (CRD #6085019) is available on the SEC's website at www.adviserinfo.sec.gov.

MARCH 6, 2025

Brochure Supplement (Part 2B of Form ADV) Supervised Person Brochure

Principal Executive Officer – Jeremiah “Jeremy” North

- Year of birth: 1976
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Item 2 - Educational Background and Business Experience

Educational Background:

- University of Missouri – Rolla; B.S. in Electrical Engineering; 1999
- University of Missouri – Rolla; B.S. in Computer Engineering; 1999
- University of Missouri – St. Louis; MBA; 2017

Business Experience:

- 360 Investment and Retirement Advisory, LLC DBA 360 IRA; Investment Advisor Representative; 09/2017 – Present
- 360 Investment and Retirement Advisory, LLC DBA 360 IRA; Managing Member/Insurance Agent; 04/2012 – Present
- US FEDS LLC; CEO; 11/2021 - Present
- Brookstone Capital Management, LLC; Investment Advisor Representative; 06/2012 – 09/2017
- Silgan; Engineer; 01/2011 – 05/2013
- Plastic Ingenuity; Engineer; 06/2008 – 01/2011
- Rexam; Engineer; 01/2000 – 06/2008

Professional Certifications

Mr. North has earned certifications and credentials that are required to be explained in further detail.

Chartered Federal Employee Benefits Consultant (ChFEBCSM) is issued by the Federal Seminars & ChFEBC, Inc. To earn the designation, a candidate must meet the following requirements:

- Three years of financial services experience
- Hold one of the following:
 - Series 6
 - Series 7
 - Series 24
 - Series 66
 - Registered Investment Advisor
 - Investment Advisor Representative
- Hold one of the following:
 - Chartered Financial Consultant (ChFC)
 - Chartered Life Underwriter (CLU)
 - Chartered Financial Analyst (CFA)
 - Certified Financial Planner (CFP)
 - Master's Degree in Business, Finance or Economics
 - Attorney's License (JD)
 - Certified Public Accountant (CPA)

- Complete 16 modules of self-study or a two-day classroom course
- Pass the two-hour exam (proctored, closed book)
- Complete 10 hours of continuing education every two years.

Item 3 - Disciplinary Information

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 - Other Business Activities Engaged In

Managing Member Jeremy North is also a licensed insurance agent. Approximately 25% of his time is spent in this practice. From time to time, he will offer Clients services from this activities.

Jeremy North is also CEO of US FEDS LLC where he provides benefits research and training for federal employees. Approximately, 25% of his time is spent in this business.

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

Item 5 - Additional Compensation

Jeremy North receives commissions on the insurance he sells. He does not receive any performance-based fees.

Item 6 - Supervision

Jeremy North is the Chief Compliance Officer of 360. He is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual.

Item 7 - Requirements for State-Registered Advisors

Arbitration Claims: None to report.

Self-Regulatory Organization or Administrative Proceeding: None to report.

Bankruptcy Petition: None to report.