



Item 1: Cover Page

Freedom Financial Planning Solutions, LLC

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Form ADV Part 2A – Firm Brochure

(616) 427-1794

Dated July 2025

This Brochure provides information about the qualifications and business practices of Freedom Financial Planning Solutions, LLC, “FFPS.” If you have any questions about the contents of this Brochure, please contact us at (616) 427-1794. 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.

Freedom Financial Planning Solutions, LLC is registered as an Investment Adviser with the Commonwealth of Virginia and the State of Michigan. Registration as an Investment Adviser does not imply any level of skill or training.

Additional information about FFPS is available on the SEC’s website at www.adviserinfo.sec.gov, which can be found using the firm’s identification number 292288.

Item 2: Material Changes

The last annual update of this Brochure was filed on January 20, 2021. Since this filing, there have been the following material changes:

- We no longer use “outside managers” and removed all references as such. We only do in-house investment management tailored to client objectives. See Item 5
- Removed references to Comprehensive Financial Planning. We only do ongoing financial planning, which is more relevant given the rapid changes in the financial world and life. See Item 5

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 Michigan 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 Freedom Financial Planning Solutions, 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 292288.

You may also request a copy of this Disclosure Brochure at any time by contacting us at (616) 427-1794.

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Item 4: Advisory Business

Description of Advisory Firm

Freedom Financial Planning Solutions, LLC is registered as an Investment Adviser with the State of Michigan and the Commonwealth of Virginia. We were founded in August 2017 and became a registered investment adviser in 2018. Steven Underriter is the principal owner of FFPS. FFPS currently reports \$2,223,532 discretionary and zero non-discretionary Assets Under Management as of December 31, 2024.

Investment Advisory Services

We offer both in-house investment advisory services or services through the use of third-party money managers ("Outside Managers" and "Sub-Advisers") for portfolio management services. We assist clients in selecting an appropriate allocation model, completing the Outside Manager's investor profile questionnaire, interacting with the Outside Manager, and reviewing the Outside Manager. Our review process and analysis of outside managers are further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the Client periodically to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees for both in-house and Outside services are outlined in Item 5 of this brochure.

In-house investment advisory services are conducted within FFPS's organization or in association with Altruist LLC's sub-advisor. FFPS may develop specifically tailored models to meet client goals and objectives.

Our Outside Managers include the following:

XY Investment Solutions ("XYIS").

XY Investment Solutions ("XYIS") is registered with the Security Exchange Commission (SEC) as an investment adviser. XYIS develops investment models utilizing a technology solution and supports financial planners with investment strategies informed by research, experience, and sound rationale. XYIS primarily allocates client assets among various mutual funds, exchange-traded funds ("ETFs"). XYIS may also allocate client assets in individual debt and equity securities, options, and independent investment managers. XYIS's services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. XYIS manages client investments in model portfolios on a discretionary basis.

Gradient Investments, LLC ("GI")

Gradient Investments, LLC ("GI") is an independent, SEC-registered investment advisor. Gradient Investments provides investment management services to individuals, pension

and profit-sharing plans, trusts, estates, corporations, charitable organizations, and small businesses. The clients to whom GI provides discretionary management services are often introduced to GI through other registered investment advisor firms operating as independent solicitors for GI.

GI is strictly a fee-only investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other products for a commission.

GI does not act as a custodian of client assets. The Client always maintains ownership of their assets. GI places trades for clients under a limited power of attorney and withdraws management fees per the Investment Proposal and Contract signed by the Client.

Clients work with their independent investment advisor/introducing advisor to determine the appropriate GI portfolio based on their investment objectives, risk tolerance, and time horizon; however, GI is available throughout the consultation process. GI is only responsible for money allocated to and managed by GI. The Client should notify their Advisor immediately if circumstances have changed concerning the goals of the funds being managed by GI.

Financial Planning

We provide financial planning services on topics such as retirement planning, risk management, college savings, student loans, cash flow, debt management, work benefits, and estate and incapacity planning.

Financial planning is a comprehensive 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 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 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 Advisor will work together to select the 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 businesses, 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 Analysis 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 / Student Loan Analysis: 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 on savings strategies are included. 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).

Student loan analysis includes a complete review of all student loans and repayment options. We will recommend a payment plan that fits your needs/objectives and assist you with form submissions. Whether delinquent or just graduating, we can help you get started on the right track.

Employee Benefits Optimization: We will provide a 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 offer estate planning services through a third party and will work along with you and the third party. We may also 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 automobiles.

***Note:** FFPS is not a licensed insurance agency or agent. FFPS will evaluate the risks to the Client's financial plan associated with being underinsured or overinsured. Should risk be identified, FFPS will recommend the Client seek a licensed insurance agent of the Client's choosing or refer the Client to a licensed insurance broker. As part of the insurance risk assessment, FFPS may use a licensed broker for insurance review at no cost or obligation on the Client's part.*

Investment Analysis: This may involve developing an asset allocation strategy to meet the Client's financial goals and risk tolerance, providing information on investment vehicles



and strategies, reviewing employee stock options, as well as assisting you in establishing your 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, 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 consideration that there is always a possibility of future changes to federal, state, or local tax laws and rates that may impact your situation. 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.

Personal Tax Preparation Service: We provide personal tax preparation services for our clients to assist with the filing of federal and state tax returns for individuals and businesses. 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 per applicable tax laws. We may observe strategic 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. We are not Certified Public Accountants (CPAs) and will not provide you with tax advice; however, we can provide you with tax strategies as outlined in the above paragraph.

Comprehensive 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 design their plans. The planner will monitor the plan, recommend any changes, and ensure the plan is up to date.

Should a client desire a comprehensive plan, the Client will be taken through 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 benefits, retirement planning, insurance, investments, college planning, and estate planning. Once the Client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis, and potential changes to their current situation will be reviewed with the Client. Clients subscribing to this service will receive a written or electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. If a follow-up meeting is required, we will meet at the Client's convenience. The plan and the Client's financial situation and goals will be monitored throughout the year and follow-up phone calls 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 this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.

Employee Benefit Plan Services

Our firm provides employee benefit plan services to employer plan sponsors on an ongoing basis. Generally, such services consist of assisting employer plan sponsors in establishing, monitoring, and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include investment options, plan structure, and participant education.

In providing employee benefit plan services, our firm does not provide any advisory services concerning the following types of assets: employer securities, real estate (excluding real estate funds and publicly traded REITS), participant loans, non-publicly traded securities, or assets, other illiquid investments, or brokerage window programs (collectively, "Excluded Assets").

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 on the needs of the attendees. These seminars are purely educational and do not involve the sale of any investment products. Information presented will not be based on any person's need, nor does FFPS 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's objectives. For investment planning, the Investment Policy Statement (IPS) 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.

Wrap Fee Programs

We do not participate in wrap-fee programs.

Item 5: Fees and Compensation

Please note, unless a client has received the firm's disclosure brochure at least 48 hours before signing the investment advisory contract, the investment advisory contract may be terminated by the Client within ten (10) 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. All fees are negotiable.

Flat Fee Financial Planning and Investment Advisory Services

The flat fee advisory service is inclusive of financial planning and investment management. It represents the best value for money. Fees are based on a tiered level and prorated against investment accounts under management and are charged on a monthly or quarterly basis per the Client's choice. Fees increase when the Client's account crosses into another tier. Cost of living increases are applied annually based on the Consumer Price Index (CPI). All Fees are negotiable.

FFPS Flat Fee Schedule			
Tier Level	Growth Level	Investable Assets	Annual Fee
0	Starting Out	<\$100K	\$600
1	Begin Growth	\$100K - \$300K	\$1,920 - \$2,760
2	Mid Growth	\$300K - \$500K	\$3,180 - \$4,500
3	Mature Growth	\$500K - <1.0M	\$6,720 - \$7,800
4	Top Growth	\$1.0M - \$5.0M	\$9,600 - \$17,500
Services Include <ul style="list-style-type: none"> • Ongoing Financial Planning • Investment Management/Wealth Preservation • Tax Planning, Roth Conversion Strategies • Estate Planning Documents Including Updates/Changes (POA only for Tier 0) • Unlimited Access via Phone/Email/Virtual Meeting • Access to the Private Financial Planning Portal • Employer Benefit Reviews • Cash Flow Optimization • RSU/Stock Options Guidance • Employer Retirement Account Reviews • Medicare Tax Reduction Strategies • Maximizing Social Security Benefits • RMD Planning & Withdrawal Strategies • Retirement Planning & Cash Flow Analysis 			
Notes <ul style="list-style-type: none"> • All plans are billed monthly or quarterly in arrears per client desires. • Since the flat fee Includes investment management, fees will be apportioned and charged against the investment accounts; otherwise, if no investment accounts are under management, fees will be invoiced directly to the Client for payment. • Investment management does not include employer-provided retirement accounts e.g. 401(k)s, 403(b)s, TSPs, etc. If the Client desires that these accounts be managed, billing will be invoiced directly to the Client. 			

Investment Advisory Services (In-House Manager - FFPS)

The advisory fees for “in-house” assets under management are based on market value. Fees are charged in arrears either on a monthly or quarterly basis per the client’s desire. Fees are submitted to the custodian who collects the fees from the accounts under management and pays the advisor. If the account balance is insufficient to collect fees, the client will be invoiced directly. All accounts under management are aggregated to determine the average daily balance. The first 100K is multiplied by 0.95%, the next 400K is multiplied by 0.75%, and so on. The total amount of the tiers is divided by 365 days to obtain the daily balance. The daily balance is multiplied by the number of days in the quarter to obtain the quarterly fee. See the sample calculation below for a \$750K aggregated account:

$$100K \times 0.95\% = \$950$$

$$400K \times 0.75\% = \$3000$$

$$250K \times 0.60\% = \$1500$$

$$\text{Total} = \$5,450/365 = \$14.93 \text{ average balance} \times 90 \text{ days in quarter} = \$1,343.70 \text{ for the quarterly fee.}$$

FFPS In-House Investment Management Fee Schedule	
Account Value	Total Annual Advisory Fee
\$0 - \$100,000	0.95%
\$100,001 - \$500,000	0.75%
\$500,001 - \$1,000,000	0.60%
\$1,000,001 and Above	0.45%

Ongoing Financial Planning Retainer Fee

Financial planning is an ongoing effort as opposed to a stand-alone Comprehensive Financial Plan and begins to become outdated as time progresses. For this reason, we only provided ongoing financial planning. Prices for this service can range from an annual fee of \$2,400 to \$7,500 depending on complexity. There is a one-time set-up fee of \$500 due upon completing the agreement. Monthly fees will be invoiced monthly in arrears. For example, an agreement is signed March 15th and \$500 deposit is made. Since the invoice is invoiced in arrears, first payment would not be due until May 1st. The monthly payments may range from \$200 - \$675 per month. The fee may be negotiable in certain cases. Fees for this service may be paid by electronic funds transfer or credit card. The agreement is ongoing and may be terminated by either party with ten business days written notice. Upon termination of the agreement, any unearned portion of the upfront fee will be prorated and refunded to the Client. Once the upfront fee has been earned, all fees are considered paid in arrears and no refund will be needed. Fees will be reviewed annually for potential increase due to cost of living or other factors such as increased complexity. All increases will be presented to



the Client and require Client approval before being implemented. Cost of living increases will be based on the annual Consumer Price Index – Urban (CPI-U).

The upfront portion of the Financial Planning fee is for client onboarding, data gathering, and setting the basis for the financial plan. This work will commence immediately after the fee is paid and will be completed per the FFPS/client agreement. The upfront portion of the fee will not be paid more than 6 months in advance before work commences.

The Client will have the option to terminate the agreement at any time with 10 business days' written notice.

Financial Planning Project Fees

Financial Planning Projects will generally be offered on an hourly rate basis of \$225. In some cases, the price may be less. The total fee will be agreed upon before the start of any work. The fee is negotiable. The hourly fee rate will be used to price individual projects. Examples of projects can be found in the table below. If an hourly rate program is chosen, half of the fee is due at the beginning of the process and the remainder is due after the work is complete, however, FFPS will not bill an amount above \$500 more than 6 months in advance. Fees for this service may be paid by electronic funds transfer or credit card. Upon termination, half of the fee that is due upfront will be non-refundable, and no further fees will be charged.

Package	Fee	Notes
Student Loan Analysis	\$225 - \$500+	<ul style="list-style-type: none">• Full analysis of existing student loans• The upper range is for the more complex situations
Employer Retirement Account Assessment	\$100 - \$250+	<ul style="list-style-type: none">• Includes risk assessment• Price dependent on level of effort
Other Assessments	\$150+	<ul style="list-style-type: none">• Price dependent on level of effort

Employee Benefit Plan Services

The fees for Employee Benefit Plan Services will be determined based on the level of engagement, the complexity of the plan, the number of employees, and the Department of Labor fiduciary standard agreed upon. Clients can expect half of the plan set-up fee due upon the start of the engagement with the remaining balance of the start-up fee due upon acceptance of the plan.

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 \$25 per participant. Half of the fees are due before the engagement, and the other half is to be paid on the day of, or no later than the conclusion of the Seminar. The fee range is based on the content, amount of research conducted, 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 25% of the Speaker's fee if the cancellation occurs within 30 days of the event. If 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.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that 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 funds 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.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for clients' transactions and determining the reasonableness of their compensation (e.g., commissions).

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. We do not accept fees based on a share of capital gains or capital appreciation of the assets of a client.

Item 7: Types of Clients

We provide financial planning and portfolio management services to individuals, high net-worth individuals, pension and profit-sharing plans, 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

Our primary methods of investment analysis are fundamental, technical, cyclical, and charting analysis.

Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Technical analysis involves using chart patterns, momentum, volume, and relative strength to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

Cyclical analysis is a type of technical analysis that involves evaluating recurring price patterns and trends based on business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Charting analysis involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which are used to predict future price movements based on price patterns and trends. Charts may not accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Digital Assets: Investing in digital assets (such as cryptocurrencies) poses significant and unique risks. Although some digital assets have had excellent long-term returns over the last decade, they also exhibit extreme volatility. Sustained long-term performance is not guaranteed. We use retail Exchange Traded Funds (ETFs) that are available through various custodians to add digital assets to a client's portfolio consistent with the Client's goals and objectives. We do not directly manage digital assets.

Passive Investment Management

We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

Passive investment management is characterized by low portfolio expenses (i.e., the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy, or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market.

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 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 adversely impact 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 such factors 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 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) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted 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 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

A criminal or civil action in a domestic, foreign, or military court of competent jurisdiction.

- **We do not have anything to report for this item.**

An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

- **We do not have anything to report for this item.**

A self-regulatory organization proceeding.

- **We do not have anything to report for this item.**

Item 10: Other Financial Industry Activities

and Affiliations

No FFPS employee is registered or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No FFPS employee is registered or has an application pending to register, as a futures commission merchant, commodity pool operator, or commodity trading advisor.

FFPS does not have any related parties. As a result, we do not have a relationship with any related parties.

FFPS 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.

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

As fiduciaries, 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 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 matters 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 nor 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 of 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. We never trade our accounts before implementing client trades. In other words, "front running" is not allowed.

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. Client trades when trading in the same securities around the same time, will be placed prior to the Advisor's own trades.

Item 12: Brokerage Practices

Factors Used to Select Custodians

Freedom Financial Planning Solutions LLC does not have any affiliation with any custodian we recommend. 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.

In recommending custodians, we must seek the "best execution" of transactions in Client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best

qualitative execution, taking into consideration the full range of the custodian's services. The factors we consider when evaluating a custodian for best execution include, without limitation, the custodians:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
- Capability to execute, clear, and settle trades (buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payments, etc.);
- The breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.);
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices;
- Reputation, financial strength, security, and stability;
- Prior service to us and our clients.

With this in consideration, our firm recommends either Charles Schwab & Co., Inc. ("Schwab"), or Altruist Financial LLC ("Altruist"). Both custodians are registered broker-dealers with the U.S. Securities Exchange Commission (SEC) and members of the Financial Industry Regulatory Authority Inc. (FINRA) and Securities Investor Protection Corporation (SIPC). Although Clients may request us to use a custodian of their choosing, we generally recommend that Clients open brokerage accounts with Schwab or Altruist. We are not affiliated with Schwab or Altruist. The Client will ultimately make the final decision of the custodian to be used to hold the Client's investments by signing the selected custodian's account opening documentation.

Research and Other Soft-Dollar Benefits

FFPS does not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client. However, because of being on their institutional platform, Schwab may provide us with certain services and products that may benefit us. All such soft dollar benefits are consistent with the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended.

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like ours. Both Schwab and Altruist provide our Clients and us with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab and Altruist retail customers. Schwab and Altruist also make available various support services. Some of those services help us manage or administer our Clients' accounts, while others help us manage and grow our business. Schwab's and Altruist's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us.

The benefits received by Advisor, or its personnel do not depend on the number of brokerage transactions directed to Schwab or Altruist. As part of its fiduciary duties to



Clients, the Advisor at all times must put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by the Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Schwab or Altruist for custody and brokerage services. This conflict of interest is mitigated as the Advisor regularly reviews the factors used to select custodians to ensure our recommendation is appropriate. Following is a more detailed description of the aforementioned custodians' support services:

Services that benefit you. Schwab's and Altruist's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client assets. The investment products available through Schwab and Altruist include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our Clients. Schwab's and Altruist's services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you. Schwab and Altruist also make available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our Clients' accounts. They include investment research, both Schwab's or Altruist's own and that of third parties. We may use this research to service all or a substantial number of our Clients' accounts, including accounts not maintained at Schwab or Altruist. In addition to investment research, Schwab and Altruist also makes available software and other technology that:

- provide access to Client account data (such as duplicate trade confirmations and account statements).
- facilitate trade execution and allocate aggregated trade orders for multiple Client accounts.
- provide pricing and other market data.
- facilitate payment of our fees from our Clients' accounts.
- assist with back-office functions, recordkeeping, and Client Reporting.

Services that generally benefit only us. Schwab and Altruist also offer other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession

Your brokerage and custody costs. For our Clients' accounts Schwab and Altruist maintain that, generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your investment account. Certain trades (for example, many mutual funds and ETFs) may not incur commissions or transaction fees.

Brokerage for Client Referrals

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

Clients Directing Which Broker/Dealer/Custodian to Use



We do recommend a specific custodian for Clients to use, however, Clients may have custody of their assets at a custodian of their choice. Clients may also direct us to use a specific custodian to execute transactions. By allowing Clients to choose a specific custodian, we may be unable to achieve the most favorable execution of Client transactions and this may cost Clients money over using a lower-cost custodian.

Aggregating (Block) Trading for Multiple Client Accounts

Investment advisers may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading, or block trading. We do not engage in block trading. It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy to implement all client orders on an individual basis. Therefore, we do not aggregate or “block” client transactions. Considering the types of investments we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

Item 13: Review of Accounts

Client accounts with the Investment Management Service will be reviewed regularly every quarter by Steven Underritter, Director and CCO. The account is reviewed with regard 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 drawdown, volatility in performance, or buy and sell decisions from the firm or per Client’s needs.

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.

FFPS will provide written reports to Investment Management clients every quarter. We urge clients to compare these reports against the account statements they receive from their custodians.

Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit or other compensation directly or indirectly, from any third party for advice rendered to our clients. Nor do we, directly or indirectly, compensate or receive compensation from any person who is



not advisory personnel for client referrals.

Charles Schwab Disclosure: As disclosed under Item 12, above, Advisor participates in Schwab's institutional customer program and Advisor may recommend Schwab to clients for custody and brokerage services. There is no direct link between the Advisor's participation in the program and the investment advice it gives to its clients, although the Advisor receives economic benefits through its participation in the program that is typically not available to Schwab 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 Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts (FFPS does not participate in block trading)); 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 Advisor by third-party vendors. Schwab may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by Schwab through the program may benefit Advisor but may not benefit its client accounts. These products or services may assist the Advisor in managing and administering client accounts, including accounts not maintained at Schwab. Other services made available by Schwab are intended to help Advisor manage and further develop its business enterprise. The benefits received by the Advisor or its personnel through participation in the program do not depend on the number of brokerage transactions directed to Schwab. As part of its fiduciary duties to clients, Advisor endeavors always to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by the Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Charles Schwab for custody and brokerage services.

Altruist Financial, LLC Disclosure: As disclosed under Item 12, above, the Advisor in some cases, uses Altruist LLC (Registered Investment Adviser) in a sub-advisory role and may recommend Altruist Financial LLC (Broker-Dealer) brokerage services. There is no direct link between the Advisor's participation in the program and the investment advice FFPS gives to its clients. FFPS does not receive any research or other soft-dollar benefit by nature from its relationship with either Altruist Financial LLC or Altruist, LLC. FFPS does not receive any referrals in exchange for using Altruist Financial LLC or Altruist Financial, LLC as their broker-dealer. FFPS does have 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. This access assists FFPS in managing client accounts. As part of its fiduciary duties to clients, FFPS endeavors always to put the interests of its clients first.

Item 15: Custody

FFPS does not accept custody of client funds except in the instance of withdrawing client



fees. For client accounts in which FFPS directly debits their advisory fee:

- i. FFPS will send a copy of its invoice to the custodian.
- 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 FFPS, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker-dealer, bank, and other qualified custodians who hold and maintain the 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.

Item 16: Investment Discretion

For those Client accounts where we provide investment advisory services, we maintain discretion over Client accounts for securities to be bought and sold and the number 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. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Item 17: Voting Client Securities

We do not vote for client proxies. Therefore, clients maintain exclusive responsibility for (1) voting proxies, and (2) acting on corporate actions about 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 bankruptcy proceedings.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per Client six months in advance.

Item 19: Requirements for State-Registered Advisers

Steven Underriter

- Born: 1951

Educational Background

- 1973 - Bachelor of Science, University of Missouri
- 2008 - MBA-Personal Finance, California Lutheran University

Business Experience

- 05/2025 – Present, Mitten Bookkeeping LLC, Owner
- 12/2020 – Present, Systems Planning and Analysis, Analyst
- 01/2018 – Present, Freedom Financial Planning Solutions, LLC, Director, and CCO
- 07/2013 – Present, Capitol Defense Consulting, LLC Analyst/Partner
- 10/2012 – 07/2013, Underriter Consulting, LLC, Owner
- 08/1994 – 09/2012, Electronic Warfare Associates, Inc., Senior Defense Analyst

Professional Designations, Licensing & Exams

- Series 65 license
- Certified Student Loan Professional (CSLP)
 - The CSLP initial qualification requires completion of over 100 lessons regarding all aspects of student loans including seven case studies. A final comprehensive exam is taken after the completion of all lessons.
 - To maintain the CSLP certification, there is a continuing education requirement that updates all changes that have occurred in the past year as well as reviewing key aspects of student loan advising. An annual exam must be passed.

Other Business Activities

- Steven Underriter is currently a Partner and Chief Operations Officer at Capitol Defense Consulting, LLC, a defense Consulting firm. This activity accounts for approximately 20 hours of his time each month.
- Steve Underriter is also a part-time employee of System Planning & Analysis Inc. as a defense analyst specializing in electronic warfare. The activity for this business is 20 hours per month.
- Steve Underriter also is the sole owner of Mitten Bookkeeping. This is a start-up company that handles bookkeeping for one client and will eventually take



over the tax preparation portion of what is currently offered by Freedom Financial Planning Solutions LLC. It is expected that the activity dedicated to this will be 8-10 hours per month. A seasonal increase will occur as the tax preparation aspect transitions over to Mitten in 2026.

Performance Based Fees

- FFPS is not compensated by performance-based fees, nor does FFPS receive compensation as a proportion of Client capital gains or other portfolio distributions.

Material Disciplinary Disclosures

- No management person at Freedom Financial Planning Solutions, 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

- Freedom Financial Planning Solutions, LLC, nor Steven Underriter, have any relationship or arrangement with issuers of securities.

Additional Compensation

- Steven Underriter does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through FFPS.

Supervision

- Steven Underriter, as Director and Chief Compliance Officer of FFPS, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Requirements for State Registered Advisers

- 1) An award or otherwise being found liable in an arbitration claim alleging damages above \$2,500, involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.

We do not have anything to report for this item.

- 1) An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.

We do not have anything to report for this item.