FINANCIAL HARVEST
WEALTH ADVISORS

FORM CRS
June 1, 2020

Client Relationship Summary

Financial Harvest, LLC is an investment advisor registered with the United States Securities and Exchange Commission.

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you. Free and simple tools are available for you to research firms and financial professionals at **Investor.gov/CRS**, which also provides educational materials about broker-dealers, investment advisors and investing.

Investment advisory and brokerage services and fees differ, and it is important for you to understand the differences. This document gives you a summary of **how we will interact with you** as an investment advisor, as opposed to a brokerage relationship, and how **you** will pay for our service.

What investment services and advice can you provide me?

We offer investment services to you based on **trust and confidence for the entire length and scope of our advisory relationship**. As part of our wealth management, services include:

- Portfolio Management
- Portfolio Monitoring
- Financial Planning
- Educational Workshop

We are a **fee-for-service** advisory firm focused on helping you achieve your financial expectations. All investment services begin with an Investment Policy Statement ("IPS") designed to identify your needs and investment goals.

Portfolio Management

Portfolio management is **offered on a discretionary basis**. Our discretionary authority is limited to rebalancing your portfolio in alignment with your IPS or to fulfill disbursement requests. We do not focus our advice and management to a limited menu of investment products (i.e.; proprietary investments or types of securities products) for your managed account. A minimum annual fee may be charged to your account if the assets in your account fall below a pre-established value; however, this may be waived or reduced if we feel circumstances are warranted. Your portfolio assets will be monitored and reviewed on an ongoing basis to ensure your objectives are being met, based on your IPS. Meetings to discuss your management portfolio can occur anytime.

Portfolio Monitoring

Portfolio monitoring consists of recommending third-party money managers to manage your investment portfolio. Under these arrangements, we are not involved in the day to day management of your portfolio assets. Our responsibility will be to continuously evaluate the performance of your portfolio to ensure the third-party money manager adheres to the standards of your IPS

Questions You Should Ask

Given my financial situation, should I choose an investment advisory service? Why or why not?

How will you choose investments to recommend to me?

What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

Financial Planning

The objective of the financial plan we create for you is to project a future outcome based on the sound financial strategies we implement today. We will work closely with you to keep you focused on where you want to go, advise you on how best to get there, and remind you to stay disciplined to achieve your financial goals.

Educational Workshop

We teach adult education courses at education institutions including, but not limited to Rollins College. The educational seminar/workshop is designed to teach how to build wealth and align your money to accomplish your life goals.

You can find more detailed information about the services we offer in our Disclosure Brochure under Item 4, "Advisory Business."

What fees will I pay?

For Portfolio Management and Portfolio Monitoring

You will pay an ongoing **asset-based fee**.

For portfolio management, the fee is based on a percentage of the value of the assets in your portfolio account. The management fee is calculated by taking the aggregate fair market value of your portfolio assets multiplied by one-fourth the corresponding annual fee rate. The fee will be billed on a calendar quarter in advance. In addition, separate from our management fee, you will incur other costs associated with your managed account that include, but are not limited to, custodial fees, account maintenance fees, mutual fund fees, and transactional fees.

For portfolio monitoring, the fee will be collected and paid to us by the third-party money manager based on their fee schedule that we will disclose to you prior to engaging them for service. All other disclosures relating to portfolio monitoring services will be made by the third-party money manager.

You should consider…

The annual fee rate you pay for portfolio management will reduce when your portfolio value, either through additional deposits or asset growth, moves into a different tier bracket of our fee schedule; however, regardless of the fee breaks we offer, the more assets there are in your managed portfolio account, the more you will pay in fees, and we may therefore have an incentive to encourage you to increase the amount of assets in your account.

Questions You Should Ask

Help me understand how these fees and costs might affect my investments. If I give you $10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

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Client Relationship Summary

For Financial Planning and Educational Workshop

You will pay a **flat fee or an hourly-based fee**.

For financial planning, the is a flat fee or an hourly-based fee depending on the scope of engagement, complexity of service requested, the nature of your personal and financial situation, and any other factors that may affect the project to perform the services you desire. You have the option on payment; however, all fees will be due by the completion date of the financial plan.

For education workshop classes, you will pay a flat fee for registration for the class that covers the course study and materials.

Implementation of a financial plan can cause you to incur other fees related and/or unrelated to our advisory practice. These costs can come from: estate planning attorneys, life insurance agents, registered representatives, and/or other independent industry professions.

You should consider…

Potential conflicts of interest can occur when we make recommendations in a financial plan. This can create a situation of divided loyalty and the objectivity of the advice rendered could be subjective and create a disadvantage to you.

You can find more detailed information about the fees we charge in our Disclosure Brochure under Item 5, "Fees & Compensation."

What are your legal obligations to me when acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment advisor, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interest. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

Questions You Should Ask

How might your conflicts of interest affect me, and how will you address them?

Advice that results in extra income to us is not always the best for you:

- Because we receive asset-based fees for portfolio management, we have an incentive to – maximize the amount of money you invest with us.
- Because we receive a share of the asset-based fees charged by third-party money managers, we have incentive to – recommend a money manager who may pay us a greater portion of the management fee for the management of your portfolio account.
- Because we can recommend outside parties in a financial plan – we have the potential to earn commissions (i.e., life insurance sales) and benefit from referrals to other professionals that can, in turn, refer potential new business to us.

You can find more detailed information about our potential conflicts of interest in our Disclosure Brochure under Item 10, "Other Financial Industry Activities & Affiliations" and under Item 14, "Client Referrals & other Compensation."

How do your financial professionals make money?

Our financial professionals are compensated from the revenues we earn from the **asset-based fees**, **flat fees** and/or **hourly-based fees** you pay for our advisory services.

Do you or your financial professionals have legal or disciplinary history?

Yes.

Visit Investor.gov/CRS for a free, simple search tool to research us and financial professionals.

Questions You Should Ask

As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information.

You can find additional information about our investment advisory services at **www.financialharvest.com**. You can also contact us at the address and phone number listed below to request up-to-date information on our firm and request a copy of the Client Relationship Summary.

Questions You Should Ask

Who is my primary contact person? Is he or she a representative of an investment advisor or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

Financial Harvest, LLC
1091 West Morse Boulevard, Suite 200
Winter Park, Florida 32789
407.937.0707

FINANCIAL HARVEST
WEALTH ADVISORS

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DISCLOSURE BROCHURE

THE INVESTMENT ADVISERS ACT OF 1940 RULE 203-1
Part 2A of Form ADV: Firm Brochure

SEC File #: 801-112271
Firm IARD/CRD #: 148271

Financial Harvest, LLC

REGISTERED INVESTMENT ADVISOR

This Disclosure Brochure provides information about the qualifications and business practices of Financial Harvest, LLC, which should be considered before becoming a client. You are welcome to contact us if you have any questions about the contents of this brochure – our contact information is listed below. Additional information about Financial Harvest, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

The information contained in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator. Furthermore, the term "registered investment advisor" is not intended to imply that Financial Harvest, LLC has attained a certain level of skill or training.

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BROCHURE DATED

1 JANUARY 2026

MATERIAL CHANGES

ITEM 2

There are no material changes to report. This Disclosure Brochure has been reviewed and is current as of the date indicated on the cover.

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BROCHURE SUPPLEMENTS

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ADVISORY BUSINESS

ITEM 4

Who We Are

Financial Harvest Wealth Advisors[1] (hereinafter referred to as the "Company", "FHWA", "we", "us", and "our") is a full-service registered investment advisor[2] offering a wide range of wealth management services[3] since October 2008 to help you, our client[4] cultivate and preserve your wealth.

Owners

The following persons control the Company:

Name	Title	CRD#
David A. Witter	Managing Member & Chief Executive Officer	4519401
Nancy K. Witter	Managing Member	4553458

Assets Under Management

We offer two (2) investment management services: Portfolio Management and Portfolio Monitoring. All Portfolio Management accounts are discretionary, and our Portfolio Monitoring accounts are non-discretionary. As of December 31, 2025, our assets under management totaled:

Discretionary Accounts.....	$557,294,396
Non-Discretionary Accounts	$108,208

For more information on our Portfolio Management and Portfolio Monitoring services see "Investment Management" services below. You can also read more about our investment services under "Portfolio Management" and "Portfolio Monitoring" that includes the cost of our services in Item 5, "**Fees & Compensation**."

Our Mission

We help families preserve their wealth, independence and autonomy in ever-changing environments so that they can focus on what is most important to them. When clients are not troubled with concerns about their wealth, they can then move autonomously to allow them to have the greatest impact on their families, friends, clients, colleagues, and community members. Our services amplify our clients' capacities for engaging their families and communities to positively affect generations to come.

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1 Financial Harvest Wealth Advisors is the d/b/a name for Financial Harvest, LLC.

2 The term "registered investment advisor" is not intended to imply that Financial Harvest Wealth Advisors has attained a certain level of skill or training. It is used strictly to reference the fact that we are "registered" as a licensed "investment advisor" with the United States Securities & Exchange Commission - and "Notice Filed" with such State Regulatory Agencies that may have limited regulatory jurisdiction over our business practices.

3 Financial Harvest, LLC is a **fiduciary**, as defined within the meaning of Title I of the Employer Retirement Income Security Act of 1974 ("ERISA") and/or as defined under the Internal Revenue Code of 1986 (the "Code") for **any wealth management services provided to a client who is**: (i) a plan participant or beneficiary of a retirement plan subject to ERISA or as described under the Code; or (ii) the beneficial owner of an Individual Retirement Account ("IRA").

4 A client could be an individual and their family members, a family office, a foundation or endowment, a charitable organization, a corporation and/or small business, a trust, a guardianship, an estate, or any other type of entity to which we choose to give investment advice.

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What We Do

We are a wealth management firm that helps our clients efficiently and effectively address the five fundamental concerns of the affluent. Through research and experience, the following five fundamental concerns have been identified:

- Making wise investment decisions throughout their lifetime to protect their lifestyle, independence, and dignity
- Mitigating income, capital gains and estate taxes
- Ensuring heirs are taken care of
- Protecting wealth from being unjustly taken
- Existential concerns such as charitable giving and leaving a legacy

We help our clients address these concerns with our Wealth Management Consultative Process (discussed below), which delivers collaborative Wealth Management solutions. Wealth Management equals Investment Consulting ("IC"), Advanced Planning ("AP") and Relationship Management ("RM").

The Wealth Management Formula: WM = IC + AP + RM

Our wealth management formula consists of three (3) components: Investment Consulting, Advanced Planning, and Relationship Management.

Investment Consulting

We offer two management options based on your financial needs. These services include: (1) Portfolio Management; and (2) Portfolio Monitoring.

Portfolio Management

Our Portfolio management strategies focus on designing, building, and maintaining a portfolio allocation, based on your Investment Plan and Investment Policy Statement ("IPS"), using primarily open-end investment company ("mutual funds") products, unit investment trusts ("UITs"), and fixed income/debt ("bonds") instruments. Occasionally we may use exchange traded funds ("ETFs") and direct participation programs (Private Offerings) to also assist with implementing your Investment plan.

You will find more information about our management services under "Portfolio Management" in Item 5, "**Fees & Compensation**" below and further description of our investment strategies under Item 8, "**Methods of Analysis, Investment Strategies & Risk of Loss**."

Portfolio Monitoring

We will recommend a third-party money manager ("Portfolio Manager"), whose investment disciplines most closely resemble your investment objectives as outlined in your IPS. Included in your IPS is:

- An asset allocation study illustrating the balancing of investment return and risk by spreading risk among various asset classes and investment vehicles as a classic way to increase portfolio security; and,
- A recommended Portfolio Manager to implement your asset allocation strategy.

Under these arrangements, we are not involved in the day-to-day management of your portfolio assets, although we are in regular communication with the Portfolio Manager concerning the services of your account. Our responsibility will be to continuously evaluate the performance of your portfolio to ensure the Portfolio Manager adheres to

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the standards of your IPS and will make recommendations regarding the Portfolio Manager as changes in the marketplace and your personal objectives dictate. More information about our "Portfolio Monitoring" services is available below under Item 5, "**Fees & Compensation**."

Advance Planning

We have found that most affluent clients want a comprehensive approach to addressing the entirety of their financial lives in tandem with investment management. We care for the array of wealth management concerns of our clients by collaborating with our Professional Network Teams to deliver The Advanced Plan.

Our Professionals Network Teams include a private client lawyer, accountant, life insurance specialist, personal lines insurance specialist, and our succession planning professional consortium for business owners. We integrate their thinking and solutions into the client's Advanced Plan, which specifically addresses wealth enhancement, wealth transfer, wealth protection and charitable planning.

The initial step during our Wealth Management Consultative Process (described in detail below) is to create a Total Client Profile (TCP) consisting of the client's concerns, objectives, relationships, values, interests, assets, professional advisors and process preferences. Once the client engages our Wealth Management Services, we present their TCP (with personal information removed to protect privacy) in a Professional Network Meeting to assess each client's unique situation and propose appropriate actions to consider. This assessment and proposed actions for consideration are the core elements to a client's Advanced Plan.

Relationship Management

Relationship Management involves three key tactics:

1. Fully understanding our clients' critical needs and meeting those needs over time through a consultative process
2. Assembling and managing a network of financial experts
3. Working effectively with our clients' other professional advisors, such as their attorneys and accountants.

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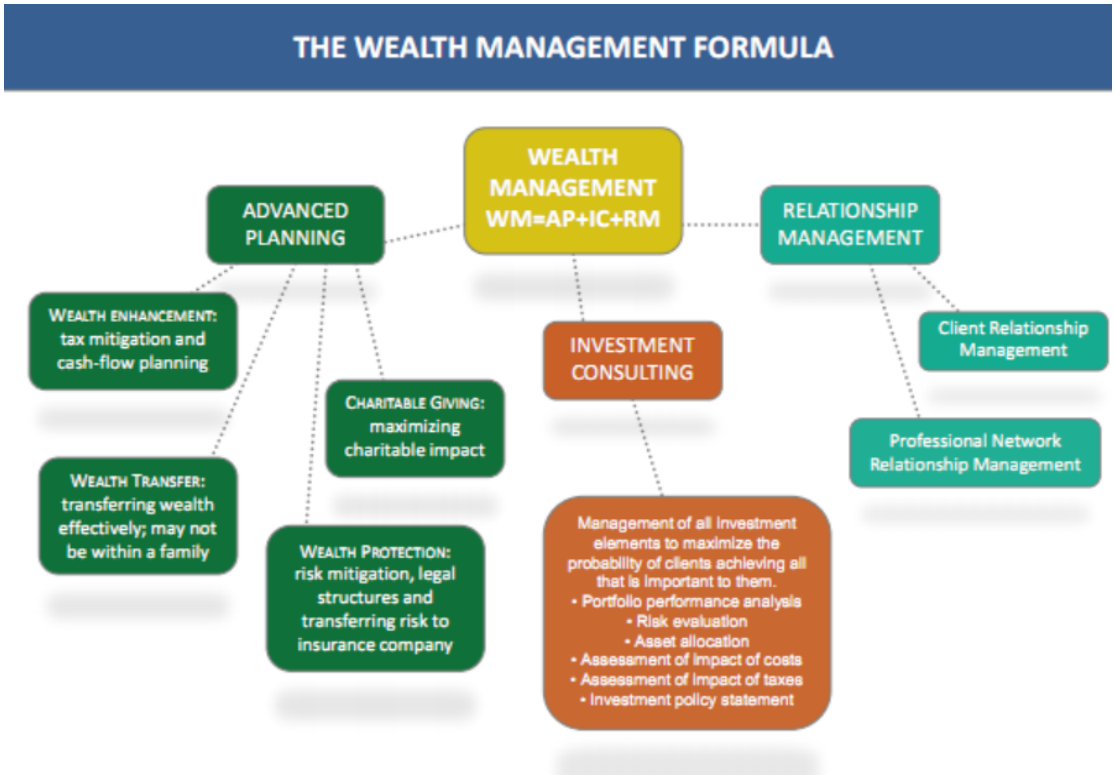
Summary - Wealth Management Formula

Initially we listen and learn from our clients to determine what is important to them and then design an Investment Plan and Advance Plan that addresses their concerns and moves them towards their financial and personal ambitions.

It is critical that the Investment and Advanced Plan be monitored on at least an annual basis. Material changes in your personal circumstances or tax and estate law changes are some of the reasons why the recommendations in your plan should be reviewed periodically.



The Wealth Management Consultative Process

Our Wealth Management Consultative Process involves five distinct appointments to help our clients care for their array of wealth management concerns. The first two meetings combined represent our Second Opinion Service (S.O.S.) while the latter three implement each client's custom designed Investment Plan and Advanced Plan.

Discovery Meeting - *During this 60 to 90 minute conversation, we ask questions to:*

- Learn your core values and guiding principles
- Understand your financial concerns and how you have been addressing them
- Discover your financial objectives and what success looks like for you
- Create a **Total Client Profile** consisting of concerns, objectives, relationships, values, interests, assets, professional advisors and process preferences
- Determine if it is appropriate to move to the Investment Plan Meeting

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Investment Plan Meeting - *During this meeting, we will present:*

- Diagnostic of your current investment plan to properly care for all of your financial concerns
- Our recommendations aimed at lowering cost, reducing risk, increase expected return, and/or increasing tax efficiency to improve the likelihood of successfully achieving your goals
- An explanation of your potential Advanced Plan for comprehensive evaluation of your entire range of wealth management needs beyond just investment strategy

Mutual Commitment Meeting

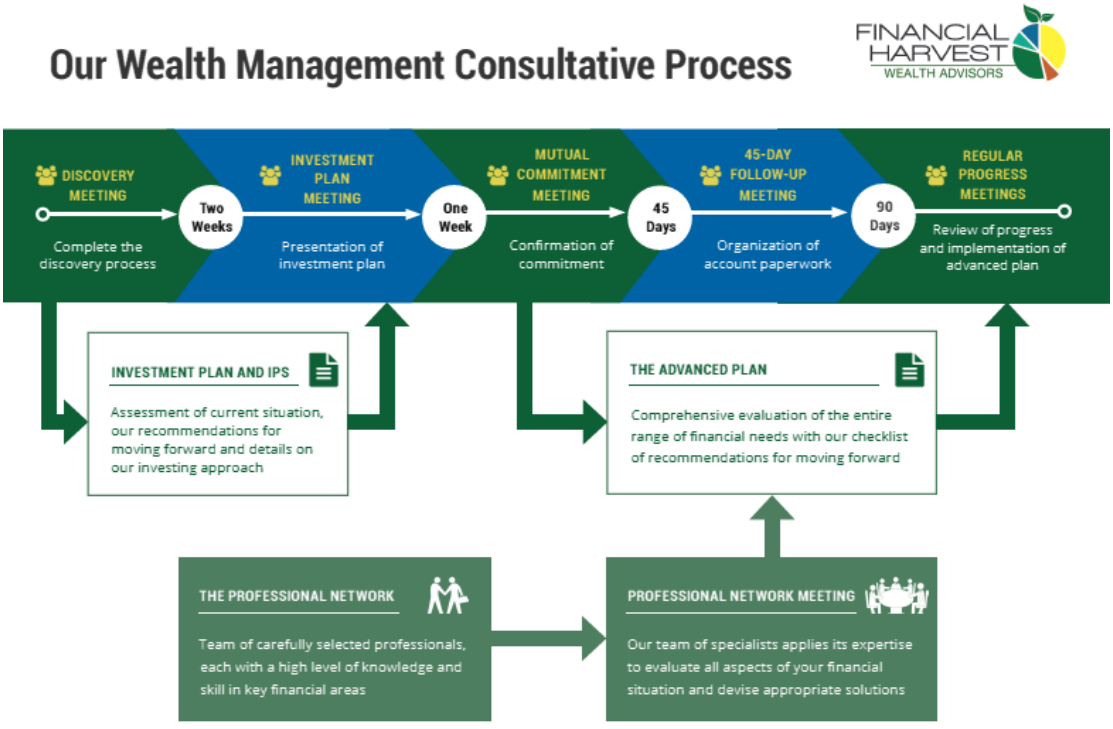
Make a mutual commitment to work together and execute the documents necessary to begin implementing your Investment Plan and proposed Advanced Plan to achieve your objectives and care for your concerns.

45-Day Follow-up Meeting

We help you understand and organize all of the financial paperwork from the account establishment process. We also establish which of your outlined objectives will be achieved during each of the forthcoming Regular Progress Meetings.

Regular Progress Meetings

Before scheduling this meeting, we have discussed your Total Client Profile with our team of carefully selected professionals, each with a high level of knowledge and skill in key financial areas, at a Professional Network Meeting. We utilize their knowledge and assessments to evaluate all aspects of your financial situation and devise appropriate solutions for consideration. Wealth Management can be overwhelming and produce unsatisfactory results when rushed. Therefore, meeting quarterly allows us to methodically progress through your specific Advanced Plan to produce your objectives.



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FEES & COMPENSATION

ITEM 5

Financial Planning

How we charge to develop a financial plan depends on the size, complexity, and nature of your personal and financial situation and the amount of time it will take to analyze, present, and implement the plan with the services engaged.

Planning Fees

Second Opinion Service

The Second Opinion Service is an evaluation of your current financial situation – based on your income and expenses, career, personal goals, investment strategy & deployment, and time horizon – to then provide you an assessment of what adjustments to your investment strategy could increase expected return, reduce risk, increase tax efficiency, and reduce costs. We also recommend financial planning steps with our Actionable Wealth Plan to achieve your outlined objectives and financial success.

The Second Opinion Service requires a two-hour retainer, **which is $750**, and will be due in full at the end of the Discovery Meeting. If at the Investment Plan meeting you choose to engage us to manage your investment portfolio(s), **we will reimburse you the $750** in the first management fee billing cycle (See "Billing" under "Protocols for Portfolio Management" below to understand when and how we bill our management fees.).

We can prepare just a financial plan. If you are not interested in our investment management services and only want to engage us to prepare a financial plan, you have two options depending on your needs: a **coordinated plan** – a mutually defined review of multiple areas of personal financial; or, a **targeted plan** – a review, analysis, and evaluation of a single core area of personal finance.

Coordinated

Coordinated financial planning services are offered for **a negotiated flat project fee not to exceed $10,000** for the initial engagement.

The coordinated planning fee will be fully disclosed in a Financial Planning Agreement at the "Planting" stage of our planning process. The Agreement will include the cost[5] to review your financial information and prepare the coordinated financial plan. We will require full payment of the coordinated planning fee up-front at the time the Agreement is signed[6].

Targeted

If you desire only targeted planning – review, analysis, and evaluation of a core area of financial need – the fee will be billed at our negotiable hourly rate not to exceed $400[7] per

[5] Rarely will a fee exceed those costs outlined in the Agreement. However, there can be instances where we did not contract with you to perform a particular task and therefore merit notifying you of the additional cost prior to beginning such services.

[6] The recommendations made in a financial plan are generally completed within 30 to 45 days from you signing the Agreement. However, implementing the plan using outside professionals (i.e., attorneys, CPAs, etc...) may require additional time that is out of our control. Therefore when we refer to the completion of the financial plan, we are referring to us (you and us) finalizing your financial benchmarks/objectives before approaching any outside professional.

[7] For a Targeted Financial Plan, we require a minimum of four hours consultation to address any personal and financial needs you may have.

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hour. All fees will be completely itemized in a billing statement to you, or as otherwise predetermined in a proposal, engagement letter and/or by retainer.

Annual Review

It is important to note that any planning is kinetic (always in motion) and alive. A financial plan is a roadmap that is only as good as how well it reflects your current financial position to then guide you on a clear path to a future financial situation. Continuously changing circumstances in your life often necessitate annual reviews designed to systematically address these unexpected diversions and continually keep you on the right road headed to your future financial destination.

Annual Review

Once the initial financial planning services have been completed, we will establish future "Annual Review" dates. The Annual Reviews generally occur after the first anniversary and will be used to review and make adjustments, if necessary, to the financial plan. Together we will set the calendar dates for your future reviews; inasmuch, an Annual Review may consist of two or three visits during the calendar year.

Annual Review Fee

We reserve the option to waive our annual review fee if we are currently managing your investments. If we are **not managing** your investment portfolio and you want us to review your financial plan, we will notify you of the cost to perform the desired work before commencing. Such retainer fee **will generally range from 25% to 50% of the first year planning fee depending on the length of time since our last review and on the services you request** (i.e., If the first year planning fee was $4,000, the annual review fee would be from $1,000 to $2,000.). However, if you have experienced significant change in your life circumstances since the date of your previously prepared plan, the fee could be higher.

Termination

Coordinated or Targeted Planning Termination

You can terminate the Financial Planning Agreement at any time prior to the presentation of any final planning documents. We will be compensated through the date of termination for time spent in design of such financial documents at the hourly rate agreed to in the Agreement. If you have prepaid any fees, such un-earned fees will be returned on a pro-rata basis. **Once the financial plan has been completed and presented to you, termination of the Financial Planning Agreement is no longer an option**.

Annual Review Termination

Annual Review services can be terminated at any time. The Company will bill you for any services rendered from the date of the last bill up to the date of termination at the fee rate that was agreed to in the proposal, engagement letter and/or retainer agreement.

Portfolio Management

Portfolio management is provided on an asset-based fee arrangement. Management fees are calculated based on the aggregate market value of your account on the last business day of the previous calendar quarter multiplied by one-fourth of the corresponding annual percentage rate for each portion of your portfolio assets that fall within each tier (See "Billing" below under "Protocols for Portfolio Management" for more information.).

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We retain discretion to negotiate the management fee within each tier on a client-by-client basis depending on the size and complexity of the portfolio managed. Fee break will occur as assets in your portfolio increase past specified tiers:

Account Value	Annual Fee Rate Not to Exceed
First $500,000.....	1.35%
Next $1,000,000	0.95%
Next $1,000,000	0.90%
Next $2,500,000	0.80%
Next $5,000,000	0.70%
Over $10,000,000.....	0.50%

We have a **$5,000 minimum annual fee** requirement ($1,250 billed quarterly), which **may be waived or reduced** if we feel circumstances are warranted. Accounts with **portfolio values that fall below $370,000 will be subject to this minimum annual fee**, which can cause our fee to exceed our highest published 1.35% Annual Fee Rate (e.g., a managed account of $200,000 with a minimum annual fee charge of $5,000, will translate into an annual fee rate of 2.50%.). Keep in mind, the further your portfolio value drops below $370,000 the higher the annual fee rate. We may recommend you engage another Investment Advisor if your account continues to decline below $200,000, which would cause our management fee to approach 3.00%. We may decline to continue to manage accounts that fall below $167,000.

Protocols for Portfolio Management

The following protocols establish how we handle our portfolio management accounts and what you should expect when it comes to: (i) managing your account; (ii) your bill for investment services; and (iii) other fees charged to your account(s).

Discretion

We establish discretionary trading authority on all management accounts to execute securities transactions at any time without your prior consent or advice. **Our trading will be limited to rebalancing your portfolio in alignment with your IPS or to fulfill a disbursement request.** At any time however, you may impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, exclude the ability to purchase securities with an inverse relationship to the market, limit our use of leverage, etc.).

Billing

Your account will be billed a blended fee quarterly **in advance** based on the fair market value for the portion of your portfolio that falls within each tier of our fee schedule. For example:

Account Value: $1,200,000	Annual Fee % (Per Tier)	Annual Fee (Billed per Tier)
First $500,000 Next $700,000	1.35% 0.95%	$6,750 $6,650
Total Annual Fee:		$13,400
Blended Annual Fee %	**1.12%**	

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For new managed accounts opened in mid-quarter, our fee will be based upon a pro-rated calculation of your assets to be managed for the current quarterly period. Advisory fees will be deducted first from any money market funds or cash balances. If such assets are insufficient to satisfy payment of such fees, a portion of the account assets will be liquidated to cover the fees.

Deposits and Withdrawals

Assets deposited by you into your portfolio management account between billing cycles will not result in additional management fees being billed to your account **unless such deposits exceed $100,000**. We do not want to discourage you from investing additional capital for your future but deposits of this amount or greater, in most cases, will require modifications and adjustments to your investment allocation. Therefore, we reserve the right to bill your account a pro-rated fee based upon the number of days remaining in the current quarterly period for deposits exceeding the above amount.

For assets you may withdraw during the quarter, we **do not make partial refunds** of our portfolio management fee. Just as with deposits, withdrawals from your account will require modifications and adjustments to be made to correct the allocation of assets in your portfolio.

Fee Exclusions

The above fees for all of our management services are exclusive of any charges imposed by the custodial firm including, but not limited to: (i) any Exchange/SEC fees; (ii) certain transfer taxes; (iii) service or account charges, including, postage/handling fees, electronic fund and wire transfer fees, auction fees, debit balances, margin interest, certain odd-lot differentials and mutual fund short-term redemption fees; and (iv) brokerage and execution costs associated with securities held in your managed account. There can also be other fees charged to your account that are unaffiliated with our management services.

In addition, all fees paid to us for portfolio management services are separate from any fees and expenses charged on mutual fund shares by the investment company or by the investment advisor managing the mutual fund portfolios. These expenses generally include management fees and various fund expense, such as: redemption fees, account fees, and purchase fees that may occur but are the exception within managed accounts at institutional custodians. A complete explanation of these expenses charged by the mutual funds is contained in each mutual fund's prospectus. You are encouraged to carefully read the fund prospectus.

Termination of Investment Services

To terminate our investment advisory services, either party (you or us) by written notification to the other party, may terminate the Investment Advisory Agreement at any time, provided such written notification is received **at least 30 days prior** to the date of termination (i.e.; To terminate services on October 1st, a request for termination should be received in our office by September 1st.) Such notification should include the date the termination will go into effect along with any final instructions on the account (i.e., liquidate the account, finalize all transactions and/or cease all investment activity).

In the event termination does not fall on the last day of a calendar quarter, you shall be entitled to a pro-rated refund of the prepaid quarterly management fee based upon the number of days remaining in the quarter after the termination notice goes into effect. Once the termination of investment advisory services has been implemented, neither party has any obligation to the other – we no longer earn management fees or give investment advice and you become responsible for making your own investment decisions.

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Portfolio Monitoring

Under the arrangements with the Portfolio Managers, we are not involved in the day to day management of your portfolio assets. **Our responsibility to the Portfolio Manager(s)** will be to ensure you meet their minimum qualifications. Once your account has been established we will perform all administrative and clerical duties as may be required to service your account. The Portfolio Manager(s) may have little or no direct contact with you.

Our responsibility to you will be to evaluate the performance of your portfolio to ensure the Portfolio Manager adheres to the standards of your IPS, and we will make recommendations to you regarding the Portfolio Manager as changes in the marketplace and your personal objectives and goals dictate.

Portfolio Managers Fee Structure

The Portfolio Managers who will be used to manage your account(s) will disclose their fees for management services in their Disclosure Brochures (the Portfolio Manager's ADV Part 2A: Firm Brochure or Part 2A Appendix 1: Wrap Fee Program Brochure), **which we will provide you prior to, or at the same time as, opening an account**. The fees that will be charged to your account(s) are also disclosed in the executed investment management agreement and will include:

1. The Portfolio Manager's management fee;
2. Our Portfolio Monitoring fee (not to exceed 1.20%) that the Portfolio Manager **will pay us from the total management fee (not to exceed 1.50%) they collect**; and,
3. Trading commissions and/or account charges, depending on if the Portfolio Manager is "wrapping" all the fees, which may be imposed by the custodian or broker/dealer used to custody your account(s).

The Portfolio Manager's Disclosure Brochure contains all pertinent disclosures relating to their management services, fee structure for such services, and their termination provisions – **you are encouraged to carefully review these disclosures**.

Portfolio Monitoring Protocols

You will want to consult the Portfolio Manager's Disclosure Brochure for their policies on how they will handle your account; such as, billing, deposits and withdrawals, fee exclusions, termination, and any other unique advisory costs associated with their service since we **do not take discretion** over the management of your account and we **do not handle any of the billing**. We will discuss these arrangements with you when we go to open your account with a Portfolio Manager; however, **you are encouraged to read their terms for management on your own.**

Educational Workshop

We teach adult education courses at education institutions including, but not limited to Rollins College. The educational seminar/workshop is designed to teach how to build wealth and align your money to accomplish your life goals. The course is completed in two 3-hour sessions covering the following topics:

- Life Planning for Retirement
- Retirement Needs & Expenses
- Retirement Roadblocks & Mistakes
- Retirement Income Sources

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- Retirement Plan Distributions
- Investments
- Risk Management & Asset Protection
- Estate Planning

We charge a registration fee not to exceed $250 per household, which covers the cost of the materials and course study at the institution where the classes are being offered. At the conclusion of the course, some participants voluntarily request appointments which can lead to portfolio management and financial planning services.

PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

ITEM 6

We do not charge fees based on a share of capital gains or the capital appreciation of the assets held in your accounts.

TYPES OF CLIENTS

ITEM 7

The types of clients we offer advisory services to are described above under "Who We Are" in Item 4, the "**Advisory Business**" section. Our minimum fee for portfolio management is disclosed above under "Portfolio Management" in Item 5 above in the, "**Fees & Compensation**" section of this Brochure.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS

ITEM 8

Portfolio Management - Methods of Analysis, Investment Strategies & Managing Risk

Our portfolio management services are designed to build long-term wealth while maintaining risk tolerance levels acceptable to you. We combine your financial needs and investment objectives, time horizon, and risk tolerance - as outlined in your IPS - to yield an effective investment strategy. Your portfolio is then tailored to these unique investment parameters using primarily open-end investment company funds ("mutual funds"), unit investment trusts ("UITs"), and fixed income/debt ("bonds") instruments. Occasionally we may use exchange traded funds ("ETFs") and direct participation programs (Private Offerings) to also assist with implementing your investment and financial plan.

Private Offerings bring on a different risk dynamic. If we recommend investment in a Private Offering, we will discuss with you the limitations of such security and the potential risk factors to your portfolio.

Methods of Analysis

In analyzing securities for inclusion in, and exclusion from, a portfolio, we utilize fund company processes to help build purer asset classes.

Pricing Exclusions

Within a specified asset class, the Pricing Exclusion process can use the following criteria for disqualifying a security from inclusion:

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- Recent initial public offerings (IPOs)
- Extreme financial distress or bankruptcy
- Merger or target acquisition

Trading Exclusions

Within a specified asset class, the Trading Exclusion process can use the following criteria for disqualifying a security from inclusion:

- Lack of exchange history
- Insufficient liquidity
- Limited operating history
- Exchange's weak protection of property ownership

Since portfolio returns are determined by asset allocation and not individual security selection, we seek purer asset classes through security selection/exclusion with the objective of capturing return premiums across the global markets.

Investment Strategies

While we are not bound to a specific investment strategy or ideology for the management of your investment portfolio, we do tend to utilize Asset Allocation, Modern Portfolio Theory, Efficient Market Hypothesis and the Fama-French Three Factor Model when designing and managing portfolios. This means we tend to allocate broadly in global markets with differing correlations, avoid active managers, and tilt towards small and value equities to capture those risk premiums.

Asset Allocation

Asset allocation is the foundation of any investment strategy we will incorporate into a portfolio. Asset allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk.

Modern Portfolio Theory

Modern Portfolio Theory ("MPT")[8] is the analysis of a portfolio of stocks as opposed to selecting individual stocks based on their unique investment opportunity. The objectives of MPT is to determine your preferred level of risk and then construct a portfolio that seeks to maximize your expected return for that given level of risk. Our investment methodology follows five (5) basic premises, each of which is derived from MPT.

1. You, as with all clients, are inherently risk-averse.
2. The markets are basically efficient.
3. The focus of attention is shifted away from individual securities analysis to consideration of portfolios as a whole, predicated on explicit risk-reward parameters.
4. For any level of risk that you are willing to accept, there is a rate of return that should be targeted.
5. Portfolio diversification is both a function of how many issues are involved, and the relationships and proportions of each asset to other correlating assets.

[8] Modern Portfolio Theory was developed and introduced by Harry M. Markowitz in his paper "Portfolio Selection" published in 1952 by the *Journal of Finance*.

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Efficient-market Hypothesis

Efficient-market Hypothesis ("EMT") asserts that financial markets are "informationally efficient," meaning one cannot consistently achieve returns in excess of average market returns on a risk-adjusted basis. Furthermore, even if there are active managers that do have superior skill at security selection, the probability of identifying those managers in advance, or with past performance, is statistically miniscule. Therefore, the expected return above the closest asset class benchmark of an active manager, on average, is negative due to their higher management and transaction costs.

Three Factor Model

The Fama-French Three Factor Model, based on more than 20 years of academic research at the University of Chicago Booth School of Business by Eugene Fama and Kenneth French, found that there are three dimensions of return for taking risk. They are:

- **Market Factor:** stocks are riskier than fixed income but have produced return premiums over long periods of time.
- **Size Factor:** small company stocks, as measured by market capitalization, are riskier than large company stocks, but have produced return premiums over long periods of time.
- **Value Factor:** value company stocks, as measured by book-to-market (BtM) ratio, are riskier than growth companies, but have produced return premiums over long periods of time.

Managing Risk

The biggest risk to you is the risk that the value of your investment portfolio will decrease due to moves in the market. This risk is referred to as the market risk factor, which is made up of four primary risks:

- **Interest Rate Risk** – Interest rate risk affects the value of bonds more than stocks. Essentially, when market interest rates begin to rise, the value (bond price) begins to drop; and vice versa, when market rates fall, bond values rise.
- **Equity Risk** – Equity risk is the risk that the value of your stocks will depreciate due to negative stock market dynamics causing the values of your portfolio to fall.
- **Currency Risk** – Currency risk is the risk that arises from the change in price of one currency against that of another. Investment values in internationally securities can be affected by changes in exchange rates.
- **Commodity Risk** – Commodity risk refers to the uncertainties of future market values and the size of future income caused by the fluctuation in the prices of commodities (i.e., grains, metals, food, electricity, etc...).

The risk factors we have cited here are not intended to be an exhaustive list, but are the most common risks your portfolio will encounter. Other risks that we have not defined could be purchasing power, political, over-concentration, and liquidity risk to name a few. However notwithstanding these risk factors, the most important thing for you to understand is that regardless of how we analyze securities or the investment strategy and methodology we use to guide us in the management of your investment portfolio, **investing in a security involves a risk of loss that you should be willing and prepared to bear;** and furthermore, **past market performance is no guarantee that you will see equal or better future returns on your investment**.

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Portfolio Monitoring – Methods of Analysis, Investment Strategies & Managing Risk

With the use of Portfolio Managers, our focus in selection and monitoring **is to balance investment return and risk, while emphasizing the spreading of risk among asset classes**. The specific methods of analysis, investment strategies, and risk management will be handled at the discretion of the Portfolio Manager.

We will perform a due-diligence review of our current and prospective Portfolio Managers to evaluate:

- **Regulatory Oversight:** Show proper licensure as: (a) a bank/trust company, (b) an insurance company, (c) a registered investment company, or (d) a registered investment advisor. In addition, a clear track record of compliance and understanding of their fiduciary duties.
- **Strategy:** The Portfolio Manager should embrace and utilize the investment strategies discussed above.
- **Stability:** The same management team should be in place for at least two years. This reflects team unity and balance.
- **Composition:** At least 80% of the Portfolio Manager's underlying securities investments should be consistent with the broad asset class.

In monitoring the investment performance of Portfolio Managers, we will utilize the above criteria to trigger when we should more closely scrutinize a particular Manager for possible replacement.

DISCIPLINARY INFORMATION

ITEM 9

FHWA has not, nor have any management persons, been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or been the subject of a criminal action.

OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS

ITEM 10

Insurance Company Activities & Affiliations

David A. Witter is the only management person licensed as a resident life, health, and fixed annuity insurance agent by the State of Florida and may be licensed as a non-resident agent in other states. Mr. Witter is licensed to sell insurance-related products and earn commissions from the sale of these products.

For further information on the potential conflicts and economic benefits from these and other activities, see Item 14, **"Client Referrals & Other Compensation"** of this Brochure. In addition, more information about our management persons who offer financial planning services and insurance activities can be found in their individual **"Brochure Supplements."**

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CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS & PERSONAL TRADING

ITEM 11

Code of Ethics

As a fiduciary, we have an affirmative duty to render continuous, unbiased investment advice, and at all times act in your best interest. To maintain this ethical responsibility, we have adopted a Code of Ethics that establishes the fundamental principles of conduct and professionalism expected by all personnel in discharging their duties. This Code is a value-laden guide committing such persons to uphold the highest ethical standards, rooted in the most elementary maxim – to do right by others. Our Code of Ethics is designed to deter inappropriate behavior and heighten awareness as to what is right, fair, just and good by promoting:

- Honest and ethical conduct
- Full, fair and accurate disclosure
- Compliance with applicable rules and regulations
- Reporting of any violation of the Code
- Accountability

To help you understand our ethical culture and standards, how we control sensitive information and what steps we take to prevent personnel from abusing their position, a copy of our Code of Ethics is available for review upon request.

Client Transactions

We have a fiduciary duty to ensure that your welfare is not subordinated to any interests of ours or any of our personnel. The following disclosures are internal guidelines we have adopted to assist us in protecting all of our clientele.

Participation or Interest

It is against our policies for any of our personnel to invest with you or with a group of clients, or to advise you or a group of clients to invest in a private business interest or other non-marketable investment unless prior approval has been granted by Mr. David A. Witter, and such investment is not in violation of any SEC and/or State rules and regulations.

Class Action Policy

The Company, as a general policy, does not elect to participate in class action lawsuits on your behalf. Rather, such decisions shall remain with you or with an entity you designate. We may assist you in determining whether you should pursue a particular class action lawsuit by assisting with the development of an applicable cost-benefit analysis, for example. However, the final determination of whether to participate, and the completion and tracking of any such related documentation, shall generally rest with you.

Personal Trading

Employees of ours are permitted to personally invest their own monies in securities, which may also be, from time to time, recommended to you. Most of the time, such investment purchases are independent of, and not connected in any way to, the investment decisions made on your behalf. However, there may be instances where investment purchases for you may also be

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made in an employee's account. In these situations, we have implemented the following guidelines in order to ensure our fiduciary integrity:

1. No employee acting as an Investment Advisor Representative (RA), or who has discretion over your account, shall buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment, unless the information is also available to the investing public on reasonable inquiry. No employee of ours shall prefer his or her own interest to that of yours or any other advisory client.
2. We maintain a list of all securities holdings for all our access employees. Mr. Witter reviews these holdings on a regular basis.
3. We require that all employees act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
4. Any individual not in observance of the above may be subject to termination.

Personal trading activities are monitored by Mr. Witter to ensure that such activities do not impact upon your security or create conflicts of interest.

BROKERAGE PRACTICES

ITEM 12

Custodial Services

The Company maintains a custodial relationship with Charles Schwab & Company, Inc. ("Schwab"), a registered broker-dealer (member FINRA/SIPC), offering custodial services through their division Schwab Advisor Services to investment advisors. Schwab offers us services which include custody of securities, trade execution, clearance, and settlement of transactions.

Our recommendation for you to custody your assets with Schwab has no direct correlation to the services we receive from Schwab and the investment advice we offer you, although **we do receive economic benefits for which we do not have to pay** through our relationship with Schwab that are typically not available to Schwab retail clients. This creates an incentive for us to recommend Schwab based on the economic benefits we receive rather than on your interest in receiving most favorable execution. These economic 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 and consulting services.
- Access to a dedicated trading desk.
- Access to batch trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to accounts).
- The ability to have advisory fees deducted directly from accounts; and,
- Access to an electronic communications network for order entry and account information; and.

We are not a subsidiary of, or an affiliated entity of, Schwab. We have sole responsibility for investment advice rendered, and **our advisory services are provided separately and independently from Schwab**.

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Trade-Away Services

Schwab provide prime brokerage trade-away services that allow us the flexibility to trade with multiple broker-dealers while maintaining a centralized master account to consolidating transactions. This service allows us to negotiate more favorable commission rates for bonds we may purchase for your portfolio.

Direction of Transactions and Commission Rates (Best Execution)

We have a fiduciary duty to put your interests before our own. The advisory support services we receive from Schwab creates an economic benefit to us and a potential conflict of interest to you; in that, our recommendation to custody your account(s) with Schwab may have been influenced by these arrangements/services. **This is not the case**; we have selected Schwab as our custodian of choice based on:

1. Their competitive transaction charges, trading platform, and on-line services for account administration and operational support.
2. Their general reputation, trading capabilities, investment inventory, their financial strength, and our personal experience in working with Schwab staff.

Since we do not recommend, suggest, or make available a selection of custodians other than Schwab, **best execution may not always be achieved**. Therefore, **you do not have to accept our recommendation to use Schwab** as your custodian. However, if you direct us to use another custodian, **we may not be able to provide you complete institutional services and such service may cost you more in transaction fees**.

Selection of Portfolio Managers

We will make available a select group of Portfolio Managers from which you may choose to manage your account(s). We will assist you in determining which will provide the most effective financial growth based upon your stated investment objectives and risk tolerance level as outlined in your IPS. **The brokerage practices of the Portfolio Manager will be disclosed in their ADV Part 2A: Firm Brochure or Part 2A Appendix 1: Wrap Fee Program Brochure, which we will provide you prior to, or at the same time as, opening an account**.

While we have exercised our best efforts evaluating the investment performance and cost of service offered by these Portfolio Managers, we make no representation that the Portfolio Manager in which we refer you has the best investment performance or has the lowest portfolio management costs. In addition, your selection of such Portfolio Managers will be limited to those with whom we have entered into service agreements. Therefore, it is possible that you might be able to contract for similar services elsewhere or separately, with equivalent or better performance at lower cost.

REVIEW OF ACCOUNTS

ITEM 13

Portfolio Management Reviews

Each account is reviewed on an ongoing basis by Mr. David A. Witter, or the Investment Advisor Representative ("RA") over your account, to ensure that your needs and objectives are being met. All accounts are reviewed in the context of your Investment Policy Statement ("IPS"). Cash needs will be adjusted as necessary.

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You will receive, at least quarterly, statements from Schwab where your account is custodied. You are encouraged to review each statement which summarizes the specific investments held, the value of your portfolio and account transactions. You are also encouraged to review with us investment strategies and account performance on an annual basis. Material changes in your personal circumstances, the general economy, or tax law changes can trigger more frequent reviews. However, **it is your responsibility to communicate these changes to us so that the appropriate adjustments can be made**.

Portfolio Monitor Reviews

Mr. Witter, or the RA over your account, will monitor and evaluate the Portfolio Managers performance on a regular basis. We understand your goals and tolerance for risk may change over time; therefore, even though we are not involved in any way with the day-to-day management of your assets maintained with a Portfolio Manager(s), we will supervise your portfolio and will make recommendations to you regarding the Portfolio Manager(s) as changes in the marketplace and your personal goals dictate.

Financial Planning Reviews

The financial planner who has designed your financial plan will work closely with you to be sure the action points identified in the financial plan have been or are being properly executed. Once the action points have been completed, the financial plan should be reviewed at least annually. Material changes in your lifestyle choices, personal circumstances, the general economy, or tax law changes can trigger more frequent reviews. However, **it is your responsibility to communicate these changes to us** so that the appropriate adjustments can be made.

CLIENT REFERRALS & OTHER COMPENSATION

ITEM 14

Referral Compensation

We may directly compensate persons/firms for client referrals, which could include revenue sharing arrangements, provided such persons are qualified and have entered a solicitation agreement with us. Under such arrangements, if a solicitor referred you to us, the solicitor will provide complete information on our relationship and the amount of compensation the solicitor will be paid should you choose to open an account. In no case will the fee that you pay be higher than it would be if you had dealt with us directly. In addition, we will adhere to each State's rules and regulations where the Solicitor resides prior to entering into any solicitation agreement with that person/firm.

Other Compensation (Indirect Benefit)

The Company receives an indirect economic benefit from Schwab (See "Custodial Services" above under Item 12, "**Brokerage Practices**" for more detailed information on these services and products could be.).

Financial Planning Compensation

Mr. David A. Witter, an Investment Advisor Representative ("RA"), is also a commissioned insurance agent (See "Insurance Company Activities & Affiliations" above in Item 10, **"Other Financial Industry Activities & Affiliations"** for more information.). This creates an incentive

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for Mr. Witter to recommend only those products in which he will receive a commission. Consequently, loyalties could be divided, and the objectivity of his advice could be subjective and create a disadvantage to you.

There are also potential conflicts of interest when an RA preparing a financial plan suggests the need for outside consultations and professional services (i.e., attorneys, accountants, etc.) to implement certain aspects of an estate or financial plan. Even though we do not share in any fees earned by the outside professionals when implementing a financial plan, it does create an incentive on our part to refer your business to only those professionals that in turn refer potential clients to us. This can eliminate the possibility for you to be referred to someone who may provide equivalent professional services, and possibly at a lower cost. Therefore, to ensure you understand the full relationship of our RAs to any related persons and outside parties that they may refer your business, as well as the choices and risks you have in receiving investment and financial planning services, the following disclosures are provided:

- Certain aspects of a financial plan may require the assistance of a Registered Representative of a broker-dealer to execute the transaction. In this situation regardless of who performs the transaction(s), **such person will be entitled to earn a commission**.
- If requested by you to implement any insurance recommendations made in the financial plan, Mr. Witter will execute such transactions through those insurance companies in which he is a licensed insurance agent. In such cases, **Mr. Witter will receive the normal commissions associated with such insurance transactions**.
- You are under no obligation to have any related parties that we recommend prepare planning documents (i.e.; financial, estate, tax, etc…). **You are free to choose those outside professionals to implement the recommendations made in the financial plan**.
- The Company does not receive any economic benefit from referring you to another professional without first notifying you of such possibilities.

Notwithstanding such potential conflicts of interest, our supervised persons and RAs strive to serve your best interest and ensure such disclosure is being properly made to you in compliance with the Investment Adviser Act of 1940, Rule 275.206.

Retirement Rollover Compensation

Earning a management fee from recommending the rollover of retirement plan assets to an IRA we manage is considered "self-dealing" and prohibited unless we comply with the Prohibited Transaction Exemption ("PTE") 2020-02, "Improving Investment Advice for Workers & Retirees" exemption issued by the Department of Labor. The DOL considers earning a management fee "self-dealing" because it increases our compensation and profits while potentially disregarding the underlying costs paid by, and the services provided under, the retirement plan that might be more beneficial to you should your retirement assets remain with the plan. Therefore, when it comes to your retirement assets, there are typically four options you should consider when leaving an employer:

- Leave the account assets in the former employer's plan, if permitted.
- Rollover the assets to the new employer's plan if one is available and rollovers are permitted.
- Rollover the account assets to an Individual Retirement Account (an "IRA"); or,
- Cash out the retirement account assets (There may be tax consequences and/or IRS penalties depending on your age.).

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Should you approach us to advise you on which option would be the best for your situation, we have an economic incentive to recommend you rollover your retirement account to a managed IRA account with us where we would earn a management fee on the assets. This can create a conflict of interest and the objectivity of the advice we render subjective and a disadvantage to you. Therefore, if we recommend you rollover your retirement account to an individually managed IRA account, you are under no obligation to engage us to manage your assets. You are free to take your account anywhere.

CUSTODY

ITEM 15

Management Fee Deduction

We do not take possession of or maintain custody of your funds or securities but will simply monitor the holdings within your portfolio and trade your account based on your stated investment objectives and guidelines. Physical possession and custody of your funds and/or securities shall be maintained with Charles Schwab & Company, Inc. ("Schwab") listed above in Item 12, "**Brokerage Practices**."

We are however defined as having custody since you have authorized us to deduct our advisory fees directly from your account. Therefore, to comply with the United States Securities and Exchange Commission's ("SEC") Custody Rule (1940 Act Rule 206(4)-2) requirements, and to protect you as well as to protect our advisory practice, we have implemented the following regulatory safeguards:

- Your funds and securities will be maintained with a qualified custodian (Schwab) in a separate account in your name.
- Authorization to withdraw our management fees directly from your account will be approved by you prior to engaging in any portfolio management services.

The custodian who will have custody of your account is required by law to send you, at least quarterly, brokerage statements summarizing the specific investments currently held in your account, the value of your portfolio, and account transactions. **You are encouraged to compare the financial data contained in our report and/or itemized fee notice with the financial information disclosed in your account statement from the custodian to verify the accuracy and correctness of our reporting**.

Standing Letters of Authorization

We will allow you to maintain a Standing Letter of Authorization ("SLOA") with our firm. However, SLOAs with asset transfer **instructions to a third-party** (e.g., any person/entity/joint account other than just you alone) define us as having custody under the Custody Rule (1940 Act Rule 206(4)-2). Therefore, to comply with the No-Action Letter issued by the SEC, relating to SLOAs and the Custody Rule, we have implemented the following regulatory safeguards and will only accept SLOAs under these conditions:

- The person and place of delivery must always be identified in the SLOA instructions. We will not approve any SLOAs where we are authorized to modify the instructions relating to the person and/or place of delivery.
- We will not accept SLOA instructions for delivery to a person affiliated with our firm and/or located at our place of business.
- The timing and amount of assets to transfer can be open-ended per the instructions of the SLOA.

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- All SLOA instructions must be in writing and confirmed with your signature. We will not accept verbal changes to any SLOAs.

The SEC SLOA No-Action Letter identifies seven (7) steps to follow as part of the safekeeping requirements. The first two bullet-points above are our responsibility under the No-action Letter, the remaining five (5) are the responsibility of the qualified custodian (Schwab). If you would like a complete list of the safekeeping instructions, let us know and we will be glad to provide you a copy.

INVESTMENT DISCRETION

ITEM 16

Securities & Amount Bought or Sold

We have you complete our Investment Advisory Agreement which sets forth our authority to buy and sell securities in whatever amounts are determined to be appropriate for your account and whether such transactions are with, or without, your prior approval.

You may, at any time, impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, exclude the ability to purchase securities with an inverse relationship to the market, limit our use of leverage, etc.).

VOTING CLIENT SECURITIES

ITEM 17

We do not vote client proxies. You understand and agree that you retain the right to vote all proxies, which are solicited for securities held in your managed accounts. Any proxy solicitations inadvertently received by us will be immediately forwarded to you for your evaluation and decision.

However, if you have specific questions regarding an action being solicited by the proxy that you do not understand or you want clarification, you may contact us and we will explain the particulars. Keep in mind we will not advise you in a direction to vote, that ultimate decision will be left to you.

FINANCIAL INFORMATION

ITEM 18

We are not required to include financial information in our Disclosure Brochure since we will not take physical custody of client funds or securities or bill client accounts six (6) months or more in advance for more than $1,200.

We are not aware of any current financial conditions that are likely to impair our ability to meet our contractual commitments to you. In addition, the Company has not, nor have any of our officers and directors, been the subject of a bankruptcy petition at any time during the past ten years.

END OF DISCLOSURE BROCHURE

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FORM ADV: PART 2B

BROCHURE SUPPLEMENT

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SUPERVISION

David A. Witter
Chief Compliance Officer

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e-mail:
david@financialharvest.com

Mr. Witter is responsible for the regulatory oversight of our advisory practice - ensuring that we our operating in compliance with federal and state regulations.

His other responsibilities include, but are not limited to, supervising investment activities, performing client reviews, and meeting with clients to discuss their investment options.

BROCHURE SUPPLEMENT DATED
1 JANUARY 2026

This Brochure Supplement provides information about David A. Witter that is an accompaniment to the Disclosure Brochure for our firm, Financial Harvest, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement, you are welcome to contact us - our contact information is listed to the left.

Additional information about Financial Harvest, LLC and David A. Witter is available on the SEC's website at www.adviserinfo.sec.gov.

David A. Witter, CFP®

CRD#: 4519401
Year of Birth: 1976

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

1998 - University of Virginia: Bachelor of Science in Electrical Engineering
2000 - University of Florida: Masters of Science in Computer Engineering

Licenses

FINRA Exams: Series 7 - General Securities Representative (Retired)
Series 66 - Uniform Combined State Law Examination (Active)

Insurance: 2-15 License - Florida Life, Health & Variable Annuity Insurance (Active)

Designations: **CERTIFIED FINANCIAL PLANNER™ (CFP®) Certification[1] (CFP® since 2006)** - The CFP® designation is issued by the Certified Financial Planner Board of Standards, Inc. The CFP® requires certificate holders to have a bachelor's degree, three (3) years professional working experience in the area of financial planning, and to successfully pass the examination process. To retain their CFP® designation certificate holders are required to pay any annual certification fee, complete 30-hours of continuing education every two (2) years, and adhere to the CFP® Board's Code of Ethics and Professional Responsibility, Rules of Conduct, and Financial Planning Practice Standards.

Business Background

06/2005 - Present .....Financial Harvest Wealth Advisors
Position: Managing Member & Chief Compliance Officer

09/2008 - 06/2011 .....Triad Advisors, Inc.
Position: Registered Representative

01/2006 - 09/2008 .....USA Financial Securities, Inc.
Position: Registered Representative

12/2004 - 01/2006 .....Gunn Allen Financial, Inc.
Position: Registered Representative

04/2002 - 12/2004 .....G.A. Repple & Company
Position: Registered Representative

DISCIPLINARY INFORMATION

Mr. Witter has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or personally ever been the subject of a criminal action.

OTHER BUSINESS ACTIVITIES

Licensed Insurance Agent

Mr. Witter is a licensed independent insurance agent. He will receive the normal commissions associated with insurance sales. This creates an incentive for him to recommend, should you inquire, those products in which he will receive a commission. Consequently, the objectivity of the advice rendered could be subjective and create a disadvantage.

You are under no obligation to accept Mr. Witter's recommendation to purchase any insurance products. You are free to choose any independent insurance agent and insurance company to purchase your insurance. Regardless of the insurance agent from whom you select to purchase your insurance, he/she will earn the normal commission from the sale.

[1] Certified Financial Planner Board of Standards, Inc. owns the certification marks CFP®, CERTIFIED FINANCIAL PLANNER™, and federally registered CFP (with flame logo), which it awards to individuals who successfully complete initial and ongoing certification requirements.

FINANCIAL HARVEST WEALTH ADVISORS

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www.financialharvest.com

Continuation of Information for:

David A. Witter, CFP®

CRD#: 4519401
Year of Birth: 1976

Licensed Insurance Agent Continued....

For more information about the potential conflicts of interest, see our Disclosure Brochure in Item 14, "**Client Referrals & Other Compensation**". Notwithstanding such potential conflicts of interest, we strive to act in your best interest and ensure disclosure is properly made to you in compliance with the Investment Advisor Act of 1940, Rule 275.206.

ADDITIONAL COMPENSATION

Mr. Witter does not receive any economic benefit, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

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FORM ADV: PART 2B

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Chief Compliance Officer

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Mr. Witter is responsible for the regulatory oversight of our advisory practice - ensuring that we our operating in compliance with federal and state regulations.

His other responsibilities include, but are not limited to, supervising investment activities, performing client reviews, and meeting with clients to discuss their investment options.

BROCHURE SUPPLEMENT DATED
1 JANUARY 2026

This Brochure Supplement provides information about Nancy K. Witter that is an accompaniment to the Disclosure Brochure for our firm, Financial Harvest, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement, you are welcome to contact us - our contact information is listed to the left.

Additional information about Financial Harvest, LLC and Nancy K. Witter is also available on the SEC's website at www.adviserinfo.sec.gov.

Nancy K. Witter

CRD#: 4553458
Year of Birth: 1976

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

1998 – University of Florida: Bachelor of Science in Marketing
2002 – Rollins College: Masters in Business Administration

Licenses

FINRA Exams: Series 65 – Uniform Investment Advisor Law Examination

Insurance: 2-15 License – Florida Life, Health & Variable Annuity Insurance (Retired)

Business Background

09/2009 – Present .....Financial Harvest Wealth Advisors
Position: Managing Member & Financial Advisor

06/2002 – 09/2009 .....Ferrell Wealth Management, Inc.
Position: Vice President & Financial Advisor

DISCIPLINARY INFORMATION

Mrs. Witter has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or, personally ever been the subject of a criminal action.

OTHER BUSINESS ACTIVITIES

Mrs. Witter is not involved in any other business activities. Full focus of her attention is directed to meeting your financial and investment needs.

ADDITIONAL COMPENSATION

Mrs. Witter does not receive any economic benefit, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

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His other responsibilities include, but are not limited to, supervising investment activities, performing client reviews, and meeting with clients to discuss their investment options.

BROCHURE SUPPLEMENT
DATED
1 JANUARY 2026

This Brochure Supplement provides information about Kellen H. Williams that is an accompaniment to the Disclosure Brochure for our firm, Financial Harvest, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement, you are welcome to contact us - our contact information is listed to the left.

Additional information about Financial Harvest, LLC and Kellen H. Williams is also available on the SEC's website at www.adviserinfo.sec.gov.

Kellen H. Williams, CFP®

CRD#: 6626126
Year of Birth: 1992

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

2015 - Vanderbilt University: Bachelor of Science in Economics
2019 - Bryant University: Financial Planning Certificate

Licenses

FINRA Exams: Series 7 - General Securities Representative (Inactive)
Series 9/10 - General Securities Sales Supervisor Examination (Inactive)
Series 66 - Uniform Combined State Law Examination (Active)

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Business Background

07/2018 - Present .....Financial Harvest Wealth Advisors
Position: Member, Director of Operations & Financial Advisor

03/2016 - 07/2018 .....Charles Schwab & Co., Inc.
Position: Senior Relationship Specialist

07/2011 - 05/2015 .....Vanderbilt University
Position: Fulltime Student

DISCIPLINARY INFORMATION

Mr. Williams has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or, personally ever been the subject of a criminal action.

OTHER BUSINESS ACTIVITIES

Mr. Williams is not involved in any other business activities. Full focus of his attention is directed to meeting your financial and investment needs.

ADDITIONAL COMPENSATION

Mr. Williams does not receive any economic benefit, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

[1] Certified Financial Planner Board of Standards, Inc. owns the certification marks CFP®, CERTIFIED FINANCIAL PLANNER™, and federally registered CFP (with flame logo), which it awards to individuals who successfully complete initial and ongoing certification requirements.

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david@financialharvest.com

Mr. Witter is responsible for the regulatory oversight of our advisory practice - ensuring that we our operating in compliance with federal and state regulations.

His other responsibilities include, but are not limited to, supervising investment activities, performing client reviews, and meeting with clients to discuss their investment options.

BROCHURE SUPPLEMENT DATED
1 JANUARY 2026

This Brochure Supplement provides information about Danica N. Bolton that is an accompaniment to the Disclosure Brochure for our firm, Financial Harvest, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement, you are welcome to contact us - our contact information is listed to the left.

Additional information about Financial Harvest, LLC and Danica N. Bolton is also available on the SEC's website at www.adviserinfo.sec.gov.

Danica N. Bolton

CRD#: 6707164
Year of Birth: 1989

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

2015 - University of Central Florida: Master of Education
2011 - Flagler College: Bachelor of Arts in Elementary Education

Licenses

FINRA Exams: Series 7 - General Securities Representative Exam (Inactive)
Series 9 - General Securities Sales Supervisor - Options Module Exam (Inactive)
Series 10 - General Securities Sales Supervisor - General Module Exam (Inactive)
Series 63 - Uniform Securities Agent State Law Examination (Inactive)
Series 65 - Uniform Investment Advisor Law Examination

Business Background

10/2019 - Present .....Financial Harvest Wealth Advisors
Position: Operations Director
09/2016 - 10/2019 .....Charles Schwab & Co., Inc.
Position: Specialist - Institutional
08/2013 - 05/2016 .....Altermese Bentley Elementary School
Position: Teacher

DISCIPLINARY INFORMATION

Mrs. Bolton has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or, personally ever been the subject of a criminal action.

OTHER BUSINESS ACTIVITIES

Mrs. Bolton is not involved in any other business activities. Full focus of her attention is directed to meeting your financial and investment needs.

ADDITIONAL COMPENSATION

Mrs. Bolton does not receive any economic benefit, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

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david@financialharvest.com

Mr. Witter is responsible for the regulatory oversight of our advisory practice - ensuring that we our operating in compliance with federal and state regulations.

His other responsibilities include, but are not limited to, supervising investment activities, performing client reviews, and meeting with clients to discuss their investment options.

BROCHURE SUPPLEMENT DATED
1 JANUARY 2026

This Brochure Supplement provides information about Josiah B. Martin that is an accompaniment to the Disclosure Brochure for our firm, Financial Harvest, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement, you are welcome to contact us - our contact information is listed to the left.

Additional information about Financial Harvest, LLC and Josiah B. Martin is also available on the SEC's website at www.adviserinfo.sec.gov.

Josiah B. Martin

CRD#: 7989951
Year of Birth: 1994

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

2020 - University of Florida: Master of Business Administration
2017 - Christopher Newport University: Bachelor of Science in Business Administration

Licenses

FINRA Exams: Series 65 - Uniform Investment Advisor Law Examination

Business Background

04/2024 - Present ..... Financial Harvest Wealth Advisors
Position: Analyst

09/2021 - 04/2024 .... Capital One Financial Corporation
Position: Sr. Analyst

05/2020 - 09/2021 .... The Home Depot, Inc.
Position: Sr. Analyst

06/2019 - 05/2020 .... University of Florida
Position: Fulltime Student

05/2017 - 06/2019 .... Dominion Energy, Inc.
Position: Financial Analyst

DISCIPLINARY INFORMATION

Mr. Martin has not been found to be the cause of, or been found to be involved in, any civil litigation, self-regulatory organization/administrative proceeding involving investment-related business activities at any time during the past ten years; or personally ever been the subject of a criminal action.

OTHER BUSINESS ACTIVITIES

Mr. Martin is not involved in any other business activities. Full focus of his attention is directed to meeting your financial and investment needs.

ADDITIONAL COMPENSATION

Mr. Martin does not receive any economic benefit, sales awards, prizes or bonuses that are based on the number of, or amount of, sales, client referrals, or from opening new accounts.

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