

## **626 Financial, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 21, 2023**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of 626 Financial, LLC (“626 Financial” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (269) 321-5040.

626 Financial is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about 626 Financial to assist you in determining whether to retain the Advisor.

Additional information about 626 Financial and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 306474.

#### **626 Financial, LLC**

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of 626 Financial. For convenience, the Advisor has combined these documents into a single disclosure document.

626 Financial believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. 626 Financial encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor amended the cost covered by its Wrap Fee Program. Please see Items 4.D. and 5.C. for additional information.
- The Advisor has amended its fee methodology for accounts held away from the Custodian. Please see Item 5 for more information.
- The Advisor is affiliated through common ownership and control with Community Access Management III, LLC, and AL Opportunity Fund 1 MM, LLC, which provide access to various private investments. Please see Item 10 for more details.
- The Advisor is affiliated through common ownership and control with 626 Foundation, Inc., a charitable organization. Please see Item 10 for further details.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations, or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 306474. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (269) 321-5040.

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## Item 4 – Advisory Services

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### A. Firm Information

626 Financial, LLC (“626 Financial” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the State of Michigan. 626 Financial was founded in October 2010 and became a registered investment advisor in January 2021. 626 Financial is owned and operated by Thomas W. Anderton (Managing Director and Chief Compliance Officer) and Brant Shrimplin (Managing Director). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by 626 Financial.

### B. Advisory Services Offered

626 Financial offers wealth management services to individuals, high-net-worth individuals, trusts, estates, businesses, and retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness, and good faith toward each Client and seeks to mitigate potential conflicts of interest. 626 Financial's fiduciary commitment is further described in the Advisor's Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Investment Management Services

626 Financial provides customized wealth management services for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management, financial planning, and related advisory services. 626 Financial works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. 626 Financial will then construct an investment portfolio consisting of exchange-traded funds (“ETFs”), diversified mutual funds, individual stocks, and/or individual bonds to achieve the Client's investment goals. The Advisor may also utilize options, real estate investment trusts (“REITs”), and alternative investments (including limited partnerships), as appropriate, to meet the needs of the Client. The Advisor may retain certain types of investments based on a Client's legacy investments based on portfolio fit and/or tax considerations.

626 Financial's investment strategies are primarily long-term focused, but the Advisor may buy, sell, or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. 626 Financial will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

626 Financial evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. 626 Financial may recommend, on occasion, redistributing investment allocations to diversify the portfolio. 626 Financial may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. 626 Financial may recommend selling positions for reasons that include but are not limited to harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, changes in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

At no time will 626 Financial accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

*Retirement Accounts* – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client's best interest, the Advisor will provide investment advice to the Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA or recommend a similar transaction, including rollovers from one ERISA-sponsored Plan to

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another, one IRA to another IRA, or from one type of account to another account (e.g., commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor earns a new (or increases its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

#### Financial Planning Services

626 Financial will typically provide a variety of financial planning and consulting services to Clients as part of an overall wealth management engagement. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to investment planning, retirement planning, personal savings, education savings, insurance needs, and other areas of a Client's financial situation.

A financial plan developed for, or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, and establish education savings and/or charitable giving programs.

626 Financial may also refer Clients to an accountant, attorney, or other specialists as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six (6) months of the contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

#### Retirement Plan Advisory Services

626 Financial provides retirement plan advisory services on behalf of company retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education
- Investment Policy Statement ("IPS") Design and Monitoring
- Investment Oversight Services (ERISA 3(21))
- Performance Reporting
- Ongoing Investment Recommendations and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

These services are provided by 626 Financial serving in the capacity of a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of 626 Financial's fiduciary status, the specific services to be rendered, and all direct and indirect compensation the Advisor reasonably expects under the engagement.

#### **C. Client Account Management**

Prior to engaging 626 Financial to provide wealth management services, each Client is required to enter into one or more agreements with the Advisor that defines the terms, conditions, authority, and responsibilities of the Advisor and the Client. These services may include:

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- Establishing an Investment Strategy – 626 Financial, in connection with the Client, develops a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – 626 Financial will develop a strategic asset allocation targeted to meet the investment objectives, time horizon, financial situation, and tolerance of risk for each Client.
- Portfolio Construction – 626 Financial will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – 626 Financial will provide investment management and ongoing oversight of the Client's investment portfolio.

#### **D. Wrap Fee Programs**

626 Financial includes, in addition to securities transaction fees, custody fees, and commission fees (herein "Covered Costs") together with investment advisory fees. Including these fees into a single, asset-based fee is considered a "Wrap Fee Program." 626 Financial customizes its investment management services for Clients. The Advisor sponsors the 626 Financial Wrap Fee Program solely as a supplement disclosure regarding the combination of fees. Depending on the level of trading required for the Client's account[s] in a particular year, the Client may pay more or less in total fees than if the Client paid its own transaction fees. Please see Appendix 1 – Wrap Fee Program Brochure, which is always included as a supplement with this Disclosure Brochure.

#### **E. Assets Under Management**

As of December 31, 2022, the Advisor manages \$260,977,856 in Client assets, \$259,905,922 of which are managed on a discretionary basis and \$1,071,934 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

### **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

#### **A. Fees for Advisory Services**

##### Wealth Management Services

Wealth management fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of the prior quarter. Wealth management fees range from 0.60% to 1.25% annually based on several factors, including the level of assets to be managed, the complexity of the services provided, and the overall relationship with the Advisor. Clients may be offered a fixed annual rate or a tiered fee schedule within this range.

##### Held-Away Accounts

For Client accounts, held-away from the Custodian, wealth management fees are paid quarterly, at the end of each quarter, pursuant to the terms of the wealth management agreement. Wealth Management fees are based on the average daily balance of assets under management during the quarter. Wealth management fees range up to 1.25% annually based on several factors, including the level of assets to be managed, the complexity of the services provided, and the overall relationship with the Advisor.

The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fee will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by 626 Financial will be independently valued by the Custodian. 626 Financial will conduct periodic reviews of the Custodian's valuations.

Clients may make additions to and withdrawals from their account[s] at any time, subject to 626 Financial's right to terminate an account. Additions may be in cash or securities provided that 626 Financial reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client's account[s]. Clients may withdraw account assets with notice to 626 Financial, subject to the usual and customary securities settlement procedures.

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However, 626 Financial designs its portfolios as long-term investments, and the withdrawal of assets may impair the achievement of a Client's investment objectives. 626 Financial may consult with its Clients about the options and ramifications of transferring securities. However, Clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e., contingent deferred sales charge), and/or tax ramifications. The Advisor's fee is exclusive of and in addition to any applicable securities transaction and custody fees and other related costs and expenses described in Item 5.C. below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Retirement Plan Advisory Services

Retirement plan advisory fees are paid quarterly, generally in advance of each calendar quarter, pursuant to the terms of the retirement plan advisory agreement. Fees are based on the market value of assets in the Plan at the end of the prior calendar quarter. Fees range up to 1.00% annually and may be negotiable depending on the size and complexity of the Plan.

### **B. Fee Billing**

#### Wealth Management Services

Wealth management fees will be calculated by the Custodian and deducted from the Client's account[s] at the Custodian in advance of each quarter. The amount due is calculated by applying the following formula:  $(\text{Prior quarter-ending valuation of total assets under management with 626 Financial} \times \text{Annual Rate}) / 360 \times 90 \text{ Days}$ . Clients will be provided with a statement, at least quarterly, from the Custodian reflecting the deduction of the wealth management fee. Clients provide written authorization permitting advisory fees to be deducted by the Custodian to be paid directly from their account[s] as part of the wealth management agreement and separate account forms provided by the Custodian.

#### Held-Away Accounts

For Client accounts held away from the Custodian, either the Advisor or Custodian will calculate and deduct the wealth management fees from the Client's account[s] at the Custodian at the end of each quarter. The amount due is calculated by applying the quarterly rate (annual rate / 4) to the average daily balance of assets under management with 626 Financial during the previous quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting the deduction of the wealth management fee. Clients provide written authorization permitting advisory fees to be deducted by the Advisor or Custodian to be paid directly from their account[s] as part of the wealth management agreement and separate account forms provided by the Custodian.

#### Retirement Plan Advisory Services

Retirement plan advisory fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties other than 626 Financial in connection with investments made on behalf of the Client's account[s]. 626 includes Covered Costs as part of its overall advisory fees through the 626 Financial Wrap Fee Program. Securities transaction fees for Client-directed trades may be charged back to the Client. Please see Item 4.D. above as well as Appendix 1 – Wrap Fee Program Brochure.

In addition, all fees paid to 626 Financial for wealth management services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage, and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of 626 Financial, but would not receive the services provided by 626 Financial, which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by 626 Financial to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

## **D. Advance Payment of Fees and Termination**

### Wealth Management Services

626 Financial may be compensated for its wealth management services in advance of the quarter in which services are rendered. Either party may terminate the wealth management agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the wealth management agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination, and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid wealth management fees from the effective date of termination to the end of the quarter. The Client's wealth management agreement with the Advisor is non-transferable without the Client's prior consent.

### Retirement Plan Advisory Services

626 Financial is compensated for its retirement plan advisory services in advance of the quarter in which services are rendered. Either party may terminate the retirement plan advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the retirement plan advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination, and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid fees from the effective date of termination to the end of the quarter. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's prior consent.

## **E. Compensation for Sales of Securities**

626 Financial does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account other than the wealth management fees noted above.

### Insurance Agency Affiliations

Certain Advisory Persons of 626 Financial are also licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by these persons are separate and in addition to advisory fees. This practice presents a conflict of interest because Advisory Persons providing investment advice on behalf of 626 Financial, who are insurance agents, have an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with the Advisor. Please see Item 10 below.

## **Item 6 – Performance-Based Fees and Side-By-Side Management**

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626 Financial does not charge performance-based fees for its wealth management services. The fees charged by 626 Financial are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client. 626 Financial does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

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626 Financial offers wealth management services to individuals, high-net-worth individuals, trusts, estates, businesses, and retirement plans. 626 Financial generally does not impose a minimum relationship size.

## **Item 8 – Methods of Analysis, Investment Strategies, and Risk of Loss**

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### **A. Methods of Analysis**

626 Financial employs fundamental and technical analysis in developing investment strategies for its Clients. Research and analysis from 626 Financial are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and reviews of company activities, including annual reports, prospectuses, press releases, and research prepared by others.



*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. This criterion generally consists of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

*Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that 626 Financial will be able to accurately predict such a reoccurrence.

As noted above, 626 Financial generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. 626 Financial will typically hold all or a portion of a security for more than a year but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, 626 Financial may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector, or asset class.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. 626 Financial will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk, and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals, or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Clients' accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment strategies:

### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF

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purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e., the risk that bond prices will fall if interest rates rise, and vice versa; the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e., the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e., the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e., the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e., the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e., the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily; therefore, a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

#### Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Options contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

#### Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call," pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

#### Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Clients should only have a portion of their assets in these investments.

#### Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. For Example, equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers, and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

**Past performance is not a guarantee of future returns. Investing in securities and other investments involves a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

### **Item 9 – Disciplinary Information**

**There are no legal, regulatory, or disciplinary events involving 626 Financial or its management persons.** 626 Financial values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 306474.

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## **Item 10 – Other Financial Industry Activities and Affiliations**

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### Insurance Agency Affiliations

As noted in Item 5, certain Advisory Persons of 626 Financial are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from an Advisory Person's role with 626 Financial. As insurance professionals, Advisory Persons will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of insurance companies. Clients are under no obligation to implement any recommendations made by the Advisor or its Advisory Persons.

### Community Access Management

The Advisor is affiliated through common ownership with Community Access Management, LLC and Community Access Management III, LLC (herein "CAM"). CAM offers access to various private fund investments. The Advisor may recommend that Clients invest in private fund investments managed by CAM. This presents a conflict of interest, as certain management persons will benefit financially if Client assets are placed into these investments. Prior to recommending private fund investments, the Advisor will conduct appropriate due diligence to ensure any recommendation to a Client to invest aligns with the Client's investment needs and objectives. In addition, the Advisor will provide additional disclosure information to each Client, which will include relevant details regarding material financial interests and compensation surrounding the private fund investment. There is no requirement for the Advisor to recommend these products to Clients, nor are Clients obligated to invest in these private funds.

### AL Opportunity Fund 1 MM, LLC

The Advisor is affiliated through common ownership with AL Opportunity Fund 1 MM, LLC (AL Opportunity Fund"). AL Opportunity Fund offers access to various private investments in memory care institutions. The Advisor may recommend that Clients invest in private investments managed by AL Opportunity Fund. This presents a conflict of interest, as certain management persons will benefit financially if Client assets are placed into these investments. Prior to recommending private investments, the Advisor will conduct appropriate due diligence to ensure any recommendation to a Client to invest aligns with the Client's investment needs and objectives. In addition, the Advisor will provide additional disclosure information to each Client, which will include relevant details regarding material financial interests and compensation surrounding the private fund investment. There is no requirement for the Advisor to recommend these products to Clients, nor are Clients obligated to invest in these private investments.

### 626 Foundation, Inc.

The Advisor is affiliated through common control and ownership with 626 Foundation, Inc. ("626 Foundation"), a 501(c)(3) charitable organization. The Advisor may recommend that Clients make a charitable contribution[s] to 626 Foundation. The Advisor will conduct the appropriate due diligence prior to recommending Clients make a charitable contribution[s] to 626 Foundation to ensure the recommendation aligns with the Clients' investment needs and objectives. There is no requirement for the Advisor to recommend 626 Foundation, nor are Clients obligated to make a charitable contribution[s] to 626 Foundation.

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

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### **A. Code of Ethics**

626 Financial has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with 626 Financial ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. 626 Financial and its Supervised Persons owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of 626 Financial's Supervised Persons to adhere not only to the specific provisions of the Code but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (269) 321-5040.

### **B. Personal Trading with Material Interest**

626 Financial allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. 626 Financial does not act as principal in any transactions. In addition, the

Advisor does not act as the general partner of a fund or advise an investment company. 626 Financial does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

626 Financial allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material, nonpublic information controls), gifts and entertainment, outside business activities, and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades or by trading based on material, nonpublic information. This risk is mitigated by 626 Financial requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). The Advisor has also adopted written policies and procedures to detect the misuse of material, nonpublic information.

### **D. Personal Trading at Same Time as Client**

While 626 Financial allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will 626 Financial, or any Supervised Person of 626 Financial, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

626 Financial does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize 626 Financial to direct trades to the Custodian as agreed upon in the wealth management agreement. Further, 626 Financial does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where 626 Financial does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by 626 Financial. However, if the recommended Custodian is not engaged, the Advisor may be limited in the services it can provide.

626 Financial will recommend that Clients establish their accounts at LPL Financial. LPL Financial is a FINRA-registered broker-dealer and member of SIPC. LPL Financial will serve as the Client's "qualified custodian." 626 Financial maintains an institutional relationship with LPL Financial, whereby the Advisor receives certain benefits. Please see Item 14 below. Following are additional details regarding the brokerage practices of the Advisor:

1. **Soft Dollars** – Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **626 Financial does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from LPL Financial. Please see Item 14 below.**
2. **Brokerage Referrals** – 626 Financial does not receive any compensation from any third party in connection with the recommendation for establishing an account.
3. **Directed Brokerage** – All Clients are serviced on a "directed brokerage basis," where 626 Financial will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]).

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626 Financial will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. 626 Financial will execute its transactions through the Custodian as authorized by the Client. 626 Financial may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of 626 Financial and periodically by the CCO. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify 626 Financial if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions, and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

## **Item 14 – Client Referrals and Other Compensation**

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### **A. Compensation Received by 626 Financial**

626 Financial may refer Clients to various unaffiliated, non-advisory professionals (e.g., attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, 626 Financial may receive non-compensated referrals of new Clients from various third parties.

#### Participation in the Institutional Advisor Platform

626 Financial has established an institutional relationship with LPL Financial to assist the Advisor in managing Client account[s]. Access to the LPL Financial platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at LPL Financial. The software and related systems support may benefit the Advisor but not its Clients directly. Further, LPL Financial has provided the Advisor with financial support in the start-up of this registered investment advisor. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

626 Financial receives support services and/or products from LPL Financial, many of which assist the Advisor to better monitor and service program accounts maintained at LPL Financial; however, some of the services and

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products benefit the Advisor and not the Clients' accounts. These support services and/or products may be received without cost, at a discount, and/or at a negotiated rate and may include the following:

- investment-related research
- pricing information and market data
- software and other technology that provides access to client account data
- compliance and/or practice management-related publications
- consulting services
- attendance at conferences, meetings, and other educational and/or social events
- marketing support
- computer hardware and/or software
- other products and services used by 626 Financial in furtherance of its investment advisory business operations

LPL Financial may provide these services and products directly or may arrange for third-party vendors to provide the services or products to Advisor. In the case of third-party vendors, LPL Financial may pay for some or all of the third party's fees.

These support services are provided to 626 Financial based on the overall relationship between the Advisor and LPL Financial. It is not the result of soft dollar arrangements or any other express arrangements with LPL Financial that involve the execution of Client transactions as a condition to the receipt of services. 626 Financial will continue to receive the services regardless of the volume of Client transactions executed with LPL Financial. Clients do not pay more for services as a result of this arrangement. There is no corresponding commitment made by the Advisor to LPL or any other entity to invest any specific amount or percentage of client assets in any specific securities as a result of the arrangement. However, because Advisor receives these benefits from LPL Financial, there is a potential conflict of interest. The receipt of these products and services presents a financial incentive for Advisor to recommend that its Clients use LPL Financial's custodial platform rather than another custodian's platform.

## **B. Compensation for Client Referrals**

626 Financial does not compensate, either directly or indirectly, any persons who are not supervised persons for Client referrals.

## **Item 15 – Custody**

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626 Financial does not accept or maintain custody of any Client accounts except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian." Clients are required to engage the Custodian to retain their funds and securities and direct 626 Financial to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare them to any reports provided by 626 Financial to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

## **Item 16 – Investment Discretion**

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626 Financial typically has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by 626 Financial. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of a wealth management agreement containing all applicable limitations to such authority. All discretionary trades made by 626 Financial will be in accordance with each Client's investment objectives and goals.



## **Item 17 – Voting Client Securities**

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626 Financial does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies; however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

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Neither 626 Financial nor its management has any adverse financial situations that would reasonably impair the ability of 626 Financial to meet all obligations to its Clients. Neither 626 Financial nor any of its Advisory Persons have been subject to a bankruptcy or financial compromise. 626 Financial is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

## **626 Financial, LLC**

### **Form ADV Part 2A – Appendix 1 (“Wrap Fee Program Brochure”)**

**Effective: March 21, 2023**

This Form ADV2A - Appendix 1 (“Wrap Fee Program Brochure”) provides information about the qualifications and business practices for 626 Financial, LLC (“626 Financial” or the “Advisor”) services when offering services pursuant to a wrap program. This Wrap Fee Program Brochure shall always be accompanied by the 626 Financial Disclosure Brochure, which provides complete details on the business practices of the Advisor. If you did not receive the complete 626 Financial Disclosure Brochure or you have any questions about the contents of this Wrap Fee Program Brochure or the 626 Financial Disclosure Brochure, please contact the Advisor at (269) 321-5040 or by email at [info@626financial.com](mailto:info@626financial.com).

626 Financial is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Wrap Fee Program Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Wrap Fee Program Brochure provides information about 626 Financial to assist you in determining whether to retain the Advisor.

Additional information about 626 Financial and its advisory persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for the Advisor’s firm name or by CRD# 306474.

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## **Item 2 – Material Changes**

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Form ADV 2A – Appendix 1 provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. In particular, this Wrap Fee Program Brochure discusses the Wrap Fee Program offering of the Advisor.

### Material Changes

The following material change has been made to this Wrap Fee Program Brochure since the last filing and distribution to Clients:

- The Advisor amended the costs covered by its Wrap Fee Program. Please see Item 4 for more information.

### Future Changes

From time to time, we may amend this Wrap Fee Program Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by the securities regulators. This complete Wrap Fee Program Brochure (along with the complete 626 Financial 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 626 Financial.

At any time, you may view this Wrap Fee Program Brochure and the current Disclosure Brochure online at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 306474. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (269) 321-5040 or by email at [info@626financial.com](mailto:info@626financial.com).

## **Item 3 – Table of Contents**

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## Item 4 – Services Fees and Compensation

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### A. Services

626 Financial, LLC (“626 Financial”) provides customized investment advisory services for its Clients. This Wrap Fee Program Brochure is provided as a supplement to the 626 Financial Form ADV Part 2A (“Disclosure Brochure”). This Wrap Fee Program Brochure is provided along with the complete Disclosure Brochure to provide full details of the business practices and fees when selecting 626 Financial as your investment advisor.

As part of the investment advisory fees noted in Item 5 of the Disclosure Brochure, 626 Financial includes, in addition to securities transaction fees, custody fees and commission fees (herein “Covered Costs”) as part of the overall investment advisory fee. Securities regulations often refer to this combined fee structure as a “Wrap Fee Program.” The Advisor sponsors the 626 Financial Wrap Fee Program.

The primary purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating to the combination of securities transaction fees into a single “bundled” investment advisory fee. This Wrap Fee Program Brochure references back to the 626 Financial Disclosure Brochure in which this Wrap Fee Program Brochure serves as an Appendix. **Please see Item 4 – Advisory Services of the Disclosure Brochure for details on 626 Financial’s investment philosophy and related services.**

### B. Program Costs

Advisory services provided by 626 Financial are offered in a wrap fee structure whereby Covered Costs are included in the overall investment advisory fee paid to 626 Financial. As the level of trading in a Client’s account[s] may vary from year to year, the annual cost to the Client may be more or less than engaging for advisory services where the transaction costs are borne separately by the Client. The cost of the Wrap Fee Program varies depending on the services to be provided to each Client; however, the Client is not charged more if there is higher trading activity in the Client’s account[s]. A Wrap Fee structure presents a conflict of interest as the Advisor is incentivized to limit the number of trades placed in the Client’s account[s] or utilize securities that do not have securities transaction fees charged by the Custodian. The Advisor will seek the most appropriate investments for the Client regardless of whether a securities transaction fee will be incurred. The Advisor may, at times, be limited to a particular share class of a fund due to availability on the Custodian platform. The Advisor will only place Client assets into a Wrap Fee Program when it is believed to be in the Client’s best interest. **Please see Item 5 – Fees and Compensation of the Disclosure Brochure for complete details on fees.**

### C. Fees

Wealth management fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of the prior calendar quarter. Wealth management fees range from 0.60% to 1.25% annually based on several factors, including the level of assets to be managed, the complexity of the services provided, and the overall relationship with the Advisor. Clients may be offered a fixed annual rate or a tiered fee schedule within this range.

The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client’s fee will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by 626 Financial will be independently valued by the Custodian. 626 Financial will conduct periodic reviews of the Custodian’s valuations.

Clients may make additions to and withdrawals from their account[s] at any time, subject to 626 Financial’s right to terminate an account. Additions may be in cash or securities provided that 626 Financial reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client’s account[s]. Clients may withdraw account assets with notice to 626 Financial, subject to the usual and customary securities settlement procedures. However, 626 Financial designs its portfolios as long-term investments, and the withdrawal of assets may impair the achievement of a Client’s investment objectives. 626 Financial may consult with its Clients about the options and ramifications of transferring securities. However, Clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e., contingent deferred sales charge), and/or tax ramifications.

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Wealth management fees will be calculated by the Custodian and deducted from the Client's account[s] at the Custodian in advance of each quarter. The amount due is calculated by applying the following formula: ([Prior quarter-ending valuation of total assets under management with 626 Financial x Annual Rate] / 360 x 90 Days). Clients will be provided with a statement, at least quarterly, from the Custodian reflecting the deduction of the wealth management fee. Clients provide written authorization permitting advisory fees to be deducted by the Custodian to be paid directly from their account[s] as part of the wealth management agreement and separate account forms provided by the Custodian.

As noted above, the Wrap Fee Program includes Covered Costs incurred in connection with the discretionary investment management services provided by 626 Financial. Securities transaction fees for Client-directed trades may be charged back to the Client. Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s]. Under this Wrap Fee Program, 626 Financial includes Covered Costs as part of its overall investment advisory fee.

In addition, all fees paid to 626 Financial for investment advisory services or part of the Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage, and account reporting), and a possible distribution fee. The Client may also incur other costs assessed by the Custodian or other parties for account-related activity fees, such as wire transfer fees, fees for trades executed away from the Custodian, and other fees. The Advisor does not control nor share in these fees. The Client should review both the fees charged by the fund[s] and the fees charged by 626 Financial to fully understand the total fees to be paid. Please see Item 5.C. – Other Fees and Expenses in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

#### **D. Compensation**

626 Financial is the sponsor and portfolio manager of this Wrap Fee Program. 626 Financial receives investment advisory fees paid by Clients for participating in the Wrap Fee Program and pays the Custodian for the costs associated with the normal trading activity in the Client's account[s].

### **Item 5 – Account Requirements and Types of Clients**

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626 Financial offers investment advisory services to 626 Financial offers wealth management services to individuals, high net worth individuals, trusts, estates, and businesses. 626 Financial generally does not impose a minimum relationship size. Please see Item 7 – Types of Clients in the Disclosure Brochure for additional information.

### **Item 6 – Portfolio Manager Selection and Evaluation**

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#### **Portfolio Manager Selection**

626 Financial serves as sponsor and as portfolio manager for the services under this Wrap Fee Program.

#### **Related Persons**

626 Financial personnel serve as portfolio managers for this Wrap Fee Program. 626 Financial does not serve as a portfolio manager for any third-party Wrap Fee Program.

#### **Performance-Based Fees**

626 Financial does not charge performance-based fees for its wealth management services. The fees charged by 626 Financial are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client. 626 Financial does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

#### **Supervised Persons**

626 Financial Advisory Persons serve as portfolio managers for all accounts, including the services described in this Wrap Fee Program Brochure. Details of the advisory services provided are included in Item 4.A. of the Disclosure Brochure.

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## Methods of Analysis

Please see Item 8 of the Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on the research and analysis methods employed by the Advisor.

## Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. 626 Financial will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk, and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals, or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Clients' accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment strategies:

**Past performance is not a guarantee of future returns. Investing in securities and other investments involves a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. Please see Item 8.B. – Risk of Loss in the Disclosure Brochure for details on investment risks.**

## Proxy Voting

626 Financial does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies; however, the Client retains the sole responsibility for proxy decisions and voting.

## Item 7 – Client Information Provided to Portfolio Managers

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626 Financial is the sponsor and sole portfolio manager for the Program. 626 Financial does not share Client information with other portfolio managers because it is the sole portfolio manager for this Wrap Fee Program. Please also see the 626 Financial Privacy Policy (included after this Wrap Fee Program Brochure).

## Item 8 – Client Contact with Portfolio Managers

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626 Financial is a full-service investment management advisory firm. Clients always have direct access to the Portfolio Managers at 626 Financial.

## Item 9 – Additional Information

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### A. Disciplinary Information and Other Financial Industry Activities and Affiliations

There are no legal, regulatory, or disciplinary events involving 626 Financial or its management persons. 626 Financial values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 306474.

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#### 626 Financial, LLC

7950 Moorsbridge Road, Suite 104, Portage, MI 49024

Phone: (269) 321-5040 | Fax: (269) 585-6059

[www.626financial.com](http://www.626financial.com)



Please see Item 9 of the 626 Financial Disclosure Brochure as well as Item 3 of each Advisory Person's Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background of the Advisor and its Advisory Persons.

#### Other Financial Activities and Affiliations

Please see Item 10 – Other Financial Activities and Affiliations of the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Program Brochure).

### **B. Code of Ethics, Review of Accounts, Client Referrals, and Financial Information**

626 Financial has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons subject to 626 Financial's compliance program (our "Supervised Persons"). Complete details on the 626 Financial Code of Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading of the Disclosure Brochure (included with this Wrap Fee Program Brochure).

#### Review of Accounts

Investments in Client accounts are monitored on a regular and continuous basis by Advisory Persons of 626 Financial under the supervision of the Chief Compliance Officer ("CCO"). Details of the review policies and practices are provided in Item 13 of the Form ADV Part 2A – Disclosure Brochure.

### **Other Compensation**

#### Participation in the Institutional Advisor Platform

626 Financial receives support services and/or products from LPL Financial, LLC ("LPL Financial"), many of which assist the Advisor to better monitor and service program accounts maintained at LPL Financial; however, some of the services and products benefit the Advisor and not the Clients' accounts. These support services and/or products may be received without cost, at a discount, and/or at a negotiated rate and may include the following:

- investment-related research
- pricing information and market data
- software and other technology that provides access to client account data
- compliance and/or practice management-related publications
- consulting services
- attendance at conferences, meetings, and other educational and/or social events
- marketing support
- computer hardware and/or software
- other products and services used by 626 Financial in furtherance of its investment advisory business operations

LPL Financial may provide these services and products directly or may arrange for third-party vendors to provide the services or products to Advisor. In the case of third-party vendors, LPL Financial may pay for some or all of the third party's fees.

These support services are provided to 626 Financial based on the overall relationship between the Advisor and LPL Financial. It is not the result of soft dollar arrangements or any other express arrangements with LPL Financial that involve the execution of Client transactions as a condition to the receipt of services. 626 Financial will continue to receive the services regardless of the volume of Client transactions executed with LPL Financial. Clients do not pay more for services as a result of this arrangement. There is no corresponding commitment made by the Advisor to LPL or any other entity to invest any specific amount or percentage of client assets in any specific securities as a result of the arrangement. However, because Advisor receives these benefits from LPL Financial, there is a potential conflict of interest. The receipt of these products and services presents a financial incentive for Advisor to recommend that its Clients use LPL Financial's custodial platform rather than another custodian's platform. Please see Item 14 – Other Compensation in the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on additional compensation that may be received by 626 Financial or its Advisory Persons. Each Advisory Person's Brochure Supplement (also included with this Wrap Fee Program Brochure) provides details on any outside business activities and the associated compensation.

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#### **626 Financial, LLC**

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#### Compensation for Client Referrals

626 Financial does not compensate, either directly or indirectly, any persons who are not supervised persons for Client referrals.

Please see Item 14 – Other Compensation in the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on additional compensation that may be received by 626 Financial or its Advisory Persons. Each Advisory Person's Brochure Supplement (also included with this Wrap Fee Program Brochure) provides details on any outside business activities and the associated compensation.

#### Financial Information

Neither 626 Financial nor its management has any adverse financial situations that would reasonably impair the ability of 626 Financial to meet all obligations to its Clients. Neither 626 Financial nor any of its Advisory Persons have been subject to a bankruptcy or financial compromise. 626 Financial is not required to deliver a balance sheet along with this Wrap Fee Program Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

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## **Form ADV Part 2B – Brochure Supplement**

**for**

**Brant Shrimplin  
Managing Director**

**Effective: March 21, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Brant Shrimplin (CRD# 4620977), in addition to the information contained in the 626 Financial, LLC (“626 Financial” or the “Advisor,” CRD# 306474) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the 626 Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (269) 321-5040 or by email at [info@626financial.com](mailto:info@626financial.com).

Additional information about Mr. Shrimplin is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his individual CRD# 4620977.

## Item 2 – Educational Background and Business Experience

Brant Shrimplin, born in 1977, is dedicated to advising Clients of 626 Financial as a Managing Director. Mr. Shrimplin earned a Bachelor of Arts degree in Marketing from Western Washington University in 2002. Additional information regarding Mr. Shrimplin's employment history is included below.

### Employment History:

Managing Director, 626 Financial, LLC	03/2021 to Present
Financial Advisor, LPL Financial, LLC	07/2009 to 08/2021
Financial Advisor, Oppenheimer & Co., Inc.	01/2003 to 07/2009

## Item 3 – Disciplinary Information

***There are no legal, civil, or disciplinary events to disclose regarding Mr. Shrimplin.*** Mr. Shrimplin has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Shrimplin.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Shrimplin.***

However, we do encourage you to independently view the background of Mr. Shrimplin on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his individual CRD# 4620977.

## Item 4 – Other Business Activities

### Insurance Agency Affiliations

Mr. Shrimplin is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Shrimplin's role with 626 Financial. As an insurance professional, Mr. Shrimplin will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Shrimplin is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Shrimplin or the Advisor. Mr. Shrimplin spends less than ten percent (10%) of his time per month in this capacity.

### Community Access Management III, LLC

Mr. Shrimplin, in his separate capacity, is an owner of Community Access Management, III LLC (herein "CAM"). CAM offers access to various private fund investments. Mr. Shrimplin may recommend that Clients invest in private fund investments managed by CAM. This presents a conflict of interest, as Mr. Shrimplin will benefit financially if Client assets are placed into these investments. Prior to recommending private investments, the Advisor will conduct appropriate due diligence to ensure any recommendation to a Client to invest aligns with the Client's investment needs and objectives. In addition, the Advisor will provide additional disclosure information to each Client, which will include relevant details regarding material financial interests and compensation surrounding the private fund investment. Clients are under no obligation to implement any recommendations made by Mr. Shrimplin or the Advisor. Mr. Shrimplin spends less than ten percent (10%) of his time per month in this capacity.

### AL Opportunity Fund 1 MM, LLC

Mr. Shrimplin, in his separate capacity, is an Owner of AL Opportunity Fund 1 MM, LLC ("AL Opportunity Fund"), an affiliated entity under common control and ownership with the Advisor. AL Opportunity Fund offers access to various private investments in memory care institutions. The Advisor may recommend that Clients invest in private investments managed by AL Opportunity Fund. This presents a conflict of interest, as Mr. Shrimplin will benefit financially if Client assets are placed into these investments. Prior to recommending private investments, the Advisor will conduct appropriate due diligence to ensure any recommendation to a Client to invest aligns with the

### 626 Financial, LLC

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Client's investment needs and objectives. In addition, the Advisor will provide additional disclosure information to each Client, which will include relevant details regarding material financial interests and compensation surrounding the private fund investment. Clients are under no obligation to implement any recommendations made by Mr. Shrimplin or the Advisor. Mr. Shrimplin spends less than ten percent (10%) of his time per month in this capacity.

#### 626 Foundation, Inc.

Mr. Shrimplin, in his separate capacity, is an Owner of 626 Foundation, Inc. ("626 Foundation"), an affiliated entity under common control and ownership with the Advisor. 626 Foundation is a 501(c)(3) charitable organization. Mr. Shrimplin may recommend that Clients make a charitable contribution[s] to 626 Foundation. Prior to recommending a charitable contribution[s], the Advisor will conduct appropriate due diligence to ensure any recommendation to a Client to invest aligns with the Client's investment needs and objectives. Clients are under no obligation to implement any recommendation made by Mr. Shrimplin or the Advisor. Mr. Shrimplin spends less than one percent (1%) of his time per month in this capacity.

#### Real Estate Investments

Mr. Shrimplin is an owner of various real estate holdings. Clients of the Advisor are not offered these services. Mr. Shrimplin spends less than one percent (1%) of his business time on this activity.

### **Item 5 – Additional Compensation**

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Mr. Shrimplin has additional business activities where compensation is received that are detailed in Item 4 above.

### **Item 6 – Supervision**

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Mr. Shrimplin serves as a Managing Director of 626 Financial and is supervised by Thomas Anderton, the Chief Compliance Officer. Mr. Anderton can be reached at (269) 321-5040.

626 Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of 626 Financial. Further, 626 Financial is subject to regulatory oversight by various agencies. These agencies require registration by 626 Financial and its Supervised Persons. As a registered entity, 626 Financial is subject to examinations by regulators, which may be announced or unannounced. 626 Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Thomas W. Anderton, CFP®  
Managing Director and  
Chief Compliance Officer**

**Effective: March 21, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Thomas W. Anderton CFP® (CRD# 4972508), in addition to the information contained in the 626 Financial, LLC (“626 Financial” or the “Advisor,” CRD# 306474) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the 626 Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (269) 321-5040 or by email at [info@626financial.com](mailto:info@626financial.com).

Additional information about Mr. Anderton is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his individual CRD# 4972508.

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## Item 2 – Educational Background and Business Experience

Thomas W. Anderton, CFP®, born in 1984, is dedicated to advising Clients of 626 Financial as a Managing Director and the Chief Compliance Officer. Mr. Anderton earned a Master of Business Administration degree from the University of Chicago in 2014. Mr. Anderton also earned a Bachelor of Science degree in Finance from the University of Florida in 2006. Additional information regarding Mr. Anderton's employment history is included below.

### Employment History:

Managing Director and Chief Compliance Officer, 626 Financial, LLC	03/2021 to Present
Financial Advisor, LPL Financial, LLC	02/2018 to 08/2021
Financial Advisor, Oppenheimer & Co., Inc.	08/2006 to 02/2018

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP®, and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by CERTIFIED FINANCIAL PLANNER™ Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 95,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that the CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by the CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP®.

### Item 3 – Disciplinary Information

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***There are no legal, civil, or disciplinary events to disclose regarding Mr. Anderton.*** Mr. Anderton has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Anderton.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Anderton.***

However, we do encourage you to independently view the background of Mr. Anderton on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his individual CRD# 4972508.

### Item 4 – Other Business Activities

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#### Insurance Agency Affiliations

Mr. Anderton is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Anderton's role with 626 Financial. As an insurance professional, Mr. Anderton will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Anderton is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Anderton or the Advisor. Mr. Anderton spends less than ten percent (10%) of his time per month in this capacity.

#### Community Access Management

Mr. Anderton, in his separate capacity, is an owner of Community Access Management, LLC and Community Access Management III, LLC (herein "CAM"). CAM offers access to various private fund investments. Mr. Anderton may recommend that Clients invest in private fund investments managed by CAM. This presents a conflict of interest, as Mr. Anderton will benefit financially if Client assets are placed into these investments. Prior to recommending private investments, the Advisor will conduct appropriate due diligence to ensure any recommendation to a Client to invest aligns with the Client's investment needs and objectives. In addition, the Advisor will provide additional disclosure information to each Client, which will include relevant details regarding material financial interests and compensation surrounding the private fund investment. Clients are under no obligation to implement any recommendations made by Mr. Anderton or the Advisor. Mr. Anderton spends less than ten percent (10%) of his time per month in this capacity.

#### AL Opportunity Fund 1 MM, LLC

Mr. Anderton, in his separate capacity, is an Owner of AL Opportunity Fund 1 MM, LLC ("AL Opportunity Fund"), an affiliated entity under common control and ownership with the Advisor. AL Opportunity Fund offers access to various private investments in memory care institutions. The Advisor may recommend that Clients invest in private investments managed by AL Opportunity Fund. This presents a conflict of interest, as Mr. Anderton will benefit financially if Client assets are placed into these investments. Prior to recommending private investments, the Advisor will conduct appropriate due diligence to ensure any recommendation to a Client to invest aligns with the Client's investment needs and objectives. In addition, the Advisor will provide additional disclosure information to each Client, which will include relevant details regarding material financial interests and compensation surrounding the private fund investment. Clients are under no obligation to implement any recommendations made by Mr. Anderton or the Advisor. Mr. Anderton spends less than ten percent (10%) of his time per month in this capacity.

#### 626 Foundation, Inc.

Mr. Anderton, in his separate capacity, is an Owner of 626 Foundation, Inc. ("626 Foundation"), an affiliated entity under common control and ownership with the Advisor. 626 Foundation is a 501(c)(3) charitable organization. Mr. Anderton may recommend that Clients make a charitable contribution[s] to 626 Foundation. Prior to recommending a charitable contribution[s], the Advisor will conduct appropriate due diligence to ensure any recommendation to a Client to invest aligns with the Client's investment needs and objectives. Clients are under

no obligation to implement any recommendation made by Mr. Anderton or the Advisor. Mr. Anderton spends less than one percent (1%) of his time per month in this capacity.

#### Real Estate Investments

Mr. Anderton is an owner of real estate holdings. Clients of the Advisor are not offered these services. Mr. Anderton spends less than two percent (2%) of his business time on this activity.

### **Item 5 – Additional Compensation**

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Mr. Anderton has additional business activities where compensation is received that are detailed in Item 4 above.

### **Item 6 – Supervision**

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Mr. Anderton serves as a Managing Director and the Chief Compliance Officer of 626 Financial. Mr. Anderton can be reached at (269) 321-5040.

626 Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of 626 Financial. Further, 626 Financial is subject to regulatory oversight by various agencies. These agencies require registration by 626 Financial and its Supervised Persons. As a registered entity, 626 Financial is subject to examinations by regulators, which may be announced or unannounced. 626 Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Ryan C. Howard  
Wealth Advisor**

**Effective: March 21, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Ryan C. Howard (CRD# 5704424), in addition to the information contained in the 626 Financial, LLC (“626 Financial” or the “Advisor,” CRD# 306474) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the 626 Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (269) 321-5040 or by email at [info@626financial.com](mailto:info@626financial.com).

Additional information about Mr. Howard is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his individual CRD# 5704424.

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**626 Financial, LLC**

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## Item 2 – Educational Background and Business Experience

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Ryan C. Howard, born in 1984, is dedicated to advising Clients of 626 Financial as a Wealth Advisor. Mr. Howard earned a Bachelor of Science in Business Administration degree in Finance from Central Michigan University in 2008. Additional information regarding Mr. Howard's employment history is included below.

### Employment History:

Wealth Advisor, 626 Financial, LLC	03/2021 to Present
Financial Advisor, LPL Financial, LLC	02/2018 to 08/2021
Financial Advisor, Oppenheimer & Co., Inc.	04/2015 to 02/2018

## Item 3 – Disciplinary Information

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***There are no legal, civil, or disciplinary events to disclose regarding Mr. Howard.*** Mr. Howard has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Howard.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Howard.***

However, we do encourage you to independently view the background of Mr. Howard on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his individual CRD# 5704424.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Howard is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Howard's role with 626 Financial. As an insurance professional, Mr. Howard will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Howard is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Howard or the Advisor. Mr. Howard spends less than ten percent (10%) of his time per month in this capacity.

## Item 5 – Additional Compensation

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Mr. Howard has additional business activities where compensation is received that are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Howard serves as a Wealth Advisor of 626 Financial and is supervised by Thomas Anderton, the Chief Compliance Officer. Mr. Anderton can be reached at (269) 321-5040.

626 Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of 626 Financial. Further, 626 Financial is subject to regulatory oversight by various agencies. These agencies require registration by 626 Financial and its Supervised Persons. As a registered entity, 626 Financial is subject to examinations by regulators, which may be announced or unannounced. 626 Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Ann Davis  
Operations Manager**

**Effective: March 21, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Ann Davis (CRD# 5829092), in addition to the information contained in the 626 Financial, LLC (“626 Financial” or the “Advisor,” CRD# 306474) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the 626 Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (269) 321-5040 or by email at [info@626financial.com](mailto:info@626financial.com).

Additional information about Ms. Davis is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her individual CRD# 5829092.

## Item 2 – Educational Background and Business Experience

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Ann Davis, born in 1969, is dedicated to advising Clients of 626 Financial as an Operations Manager. Ms. Davis earned a Bachelor of Science degree in Economics from Pennsylvania State University in 1991. Additional information regarding Ms. Davis's employment history is included below.

### Employment History:

Operations Manager, 626 Financial, LLC	03/2021 to Present
Operations Manager, LPL Financial, LLC	08/2010 to 08/2021
Director, Creekside Business Center	12/2003 to 08/2010

## Item 3 – Disciplinary Information

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***There are no legal, civil, or disciplinary events to disclose regarding Ms. Davis.*** Ms. Davis has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Ms. Davis.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Ms. Davis.***

However, we do encourage you to independently view the background of Ms. Davis on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her individual CRD# 5829092.

## Item 4 – Other Business Activities

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### Real Estate Property Manager

Ms. Davis is an operations/property manager of various real estate holdings. Clients of the Advisor are not offered these services. Ms. Davis spends approximately five percent (5%) of her business time on this activity.

## Item 5 – Additional Compensation

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Ms. Davis is dedicated to the investment advisory activities of 626 Financial's Clients. Ms. Davis does not receive any additional forms of compensation.

## Item 6 – Supervision

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Ms. Davis serves as an Operations Manager for 626 Financial and is supervised by Thomas Anderton, the Chief Compliance Officer. Mr. Anderton can be reached at (269) 321-5040.

626 Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of 626 Financial. Further, 626 Financial is subject to regulatory oversight by various agencies. These agencies require registration by 626 Financial and its Supervised Persons. As a registered entity, 626 Financial is subject to examinations by regulators, which may be announced or unannounced. 626 Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Karen D. Morse  
Client Care Manager**

**Effective: March 21, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Karen D. Morse (CRD# 2200990) in addition to the information contained in the 626 Financial, LLC (“626 Financial” or the “Advisor,” CRD# 306474) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the 626 Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (269) 321-5040 or by email at [info@626financial.com](mailto:info@626financial.com).

Additional information about Ms. Morse is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her individual CRD# 2200990.

## Item 2 – Educational Background and Business Experience

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Karen D. Morse, born in 1962, is dedicated to advising Clients of 626 Financial as a Client Care Manager. Ms. Morse earned a Master of Business Administration degree from Western Michigan University in 1990. Ms. Morse also earned a Bachelor of Arts from Michigan State University in 1984. Additional information regarding Ms. Morse's employment history is included below.

### Employment History:

Client Care Manager, 626 Financial, LLC	03/2021 to Present
Registered Sales Assistant, LPL Financial, LLC	02/2018 to 08/2021
Senior Financial Associate, Oppenheimer & Co., Inc.	02/2007 to 02/2018

## Item 3 – Disciplinary Information

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***There are no legal, civil, or disciplinary events to disclose regarding Ms. Morse.*** Ms. Morse has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Ms. Morse.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Ms. Morse.***

However, we do encourage you to independently view the background of Ms. Morse on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her individual CRD# 2200990.

## Item 4 – Other Business Activities

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Ms. Morse is dedicated to the investment advisory activities of 626 Financial's Clients. Ms. Morse does not have any other business activities.

## Item 5 – Additional Compensation

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Ms. Morse is dedicated to the investment advisory activities of 626 Financial's Clients. Ms. Morse does not receive any additional forms of compensation.

## Item 6 – Supervision

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Ms. Morse serves as a Client Care Manager of 626 Financial and is supervised by Thomas Anderton, the Chief Compliance Officer. Mr. Anderton can be reached at (269) 321-5040.

626 Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of 626 Financial. Further, 626 Financial is subject to regulatory oversight by various agencies. These agencies require registration by 626 Financial and its Supervised Persons. As a registered entity, 626 Financial is subject to examinations by regulators, which may be announced or unannounced. 626 Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

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Effective: March 21, 2023

### Our Commitment to You

626 Financial, LLC ("626 Financial" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. 626 Financial (also referred to as "we," "our," and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

626 Financial does not sell your nonpublic personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal nonpublic information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address, and phone number[s]	Income and expenses
Email address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage, and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service the account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural, and electronic security measures. These include such safeguards as secure passwords, encrypted file storage, and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Clients' personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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#### 626 Financial, LLC

7950 Moorsbridge Road, Suite 104, Portage, MI 49024

Phone: (269) 321-5040 | Fax: (269) 585-6059

[www.626financial.com](http://www.626financial.com)

### How do we share your information?

An RIA shares Clients' personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share nonpublic personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, and other financial institutions) as necessary for us to provide agreed-upon services to you, consistent with applicable law, including but not limited to processing transactions, general account maintenance, responding to regulators or legal investigations, and credit reporting.	Yes	No
<b>Marketing Purposes</b> 626 Financial does not disclose and does not intend to disclose personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where 626 Financial or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your nonpublic personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> 626 Financial does not disclose and does not intend to disclose nonpublic personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### State-specific Regulations

<b>California</b>	In response to a California law, to be conservative, we assume that accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
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### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of nonpublic personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (269) 321-5040.