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**Item 1 Form ADV Part 2A – Firm Brochure**  
Firm CRD #299507

March 25, 2024

This brochure provides information about the qualifications and business practices of Leverage Financial Advisory. If you have any questions about the contents of this brochure, please contact us at (617) 356-1852.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration as a registered investment advisor does not imply a certain level of skill or training. Additional information about Leverage Financial Advisory, CRD #299507 also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Material Changes

Leverage Financial Advisory is required to make clients aware of any important information that may have changed since the Firm Brochure was last updated. Clients can then determine whether to review the brochure in its entirety or to contact us with questions about the changes.

The following material changes have been made since our previous filing dated March 29, 2023:

- Item 4 – Updated Assets Under Management (AUM)
- Item 4 – Added Commodity ETFs to Investment Management Portfolios
- Item 4 – Added that Newsletters are provided to clients and prospective clients free of charge
- Item 5 – Updated Quarterly Fees to include end-of-quarter account balances to be used for fee calculations
- Item 5 - Increased Minimum Fees to \$500 Per Quarter
- Item 8 - Added Tactical Asset Allocation Strategy and Associated Risks
- Item 8 – Added Momentum Investing and Associated Risks
- Item 8 – Added Bond ETF Risks
- Item 8 – Added Commodity ETF Risks
- Item 8 – Added Cryptocurrency ETF Risks
- Item 8 – Added American Depositary Receipts (ADRs) Risk
- Item 8 – Added Money Market Funds Risk
- Item 8 – Removed Sector Rotation
- Item 8 – Removed ESG ETFs
- Item 19 – Added Professional Designations: Chartered Market Technician® (CMT)

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## **Item 4 Advisory Business**

### **Description of Advisory Firm**

Leverage Financial Advisory, LLC (“Leverage Financial Advisory”) was formed as a limited liability company in the Commonwealth of Massachusetts on October 27, 2018. The principal owner of the firm is Brian Bond. The firm is registering as an investment advisor with the Commonwealth of Massachusetts securities regulators. The firm provides investment supervisory and management services, financial planning, general investment consulting and educational seminars and workshops.

The following paragraphs describe our services and fees. As used in this Disclosure Brochure, the words “LFA”, “advisor,” “firm,” “we,” “our,” and “us” refer to Leverage Financial Advisory and the words “you,” “your,” and “client” refer to you as either a client or prospective client of our firm.

### **Description of Advisory Services Offered**

Leverage Financial Advisory provides personalized financial planning and investment management services to individuals, married couples, and business entities, with a particular focus on hospitality industry professionals and small business owners. Advice is provided through consultation with the client and may include assessing existing financial assets, net worth, cash flow, and liabilities, budgeting, determination of financial goals and objectives, investment management, education planning, insurance reviews, retirement planning, tax planning, estate planning, and working in collaboration with a client’s other professional advisors such as CPA’s and attorneys.

Leverage Financial Advisory acts in a fiduciary capacity with its clients. As a fiduciary, we are bound ethically to act in our client’s best interests. Any conflicts of interest will be disclosed to the client in the unlikely event they should occur. We do not receive any commissions for any advice or recommendations we provide. We work with each client to organize and evaluate their financial profile and help them to accomplish individual goals and objectives.

Leverage Financial Advisory takes the time to get to know each client to provide the highest level of personalized service. Importantly, within this context, we monitor the changing needs of each client and aim to proactively address all relevant financial and investment matters. The initial meeting, which may be done virtually or by telephone, is free of charge and is generally an informal discussion to determine the extent to which our financial planning and/or investment management services may be beneficial to the client.

Advisory services are provided under the terms and conditions of a written advisory agreement executed by Leverage Financial Advisory, LLC and the client. We offer the following services:

### **Investment Management**

Leverage Financial Advisory offers ongoing investment supervisory and management services based on the individual goals, objectives, time horizons, and risk tolerance of each client. LFA evaluates the current investments of each client, and then constructs an investment plan and recommended portfolio well suited for each client’s needs and objectives. LFA will request discretionary authority from each client to select securities and execute transactions without permission from the client before each transaction.

Clients may engage Leverage Financial Advisory to manage and/or offer investment advice on certain investments that are not maintained at LFA’s primary custodian, called Held Away Accounts, such as assets held in employer-sponsored retirement plans, and/or assets held in qualified tuition plans (i.e., 401k’s, 529 plans). In these situations, LFA directs or recommends the allocation of client assets in each plan using a Limited Power of Attorney, or a Held Away Accounts Order Management System through Pontera Solutions Inc (“Pontera”).

Leverage Financial Advisory’s recommended portfolios generally consist of individual stocks, exchange-traded funds (ETFs), and/or index mutual funds. ETFs and index mutual funds are typically low-cost, diversified securities made up of stocks, bonds, and commodities. A typical portfolio made up of ETFs may include domestic (U.S.) stocks, bonds, short-term treasuries, foreign (non-U.S.) stocks, and commodities such as gold. We believe that investing in a variety of non-correlated asset classes helps to broadly diversify and manage the risk of our investment portfolios.

## Leverage Financial Advisory's Collaborative 5-Step Investment Management Process

### Taxable Brokerage Accounts (Savings, Emergency Funds, Inheritance)

1. The client completes an Investor Risk Profile Questionnaire which provides the client with a score.
2. Based on their score, a corresponding asset allocation portfolio is recommended.
3. The advisor and client then discuss the risks and historical returns of the recommended portfolio.
4. Other factors are discussed such as the client's investing experience, time horizon, goals, and objectives.
5. Based on the conversations, the client then selects their preferred asset allocation portfolio.

### Tax Deferred Retirement Accounts (IRAs, Rollover IRAs, Roth IRAs, Inherited IRAs, 401K's, 403B's)

1. The client's birthday and desired year of retirement is input into the client's personal finance website.
2. Based on the year they would like to retire; a corresponding asset allocation portfolio is recommended.
3. The advisor and client then discuss the risks and historical returns of the recommended portfolio.
4. Other factors are discussed such as the client's current retirement savings and projected retirement needs.
5. Based on the conversations, the client then selects their preferred asset allocation portfolio.

### Education Savings Plan Accounts (Taxable Brokerage Accounts, 529 Plans)

1. The client's child's birthday and desired first year of college is recorded, typically age 18.
2. Based on the year they would start college; a corresponding asset allocation portfolio is recommended.
3. The advisor and client then discuss the risks and historical returns of the recommended portfolio.
4. Other factors are discussed such as current education savings and the cost of public vs. private college.
5. Based on the conversations, the client then selects their preferred asset allocation portfolio.

### Personal Financial Planning

Leverage Financial Advisory offers its clients a broad range of financial planning services on a one-time or ongoing basis. In general, financial planning will address any or all of the following areas of interest. The client and advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following services:

- **Personal Budgeting:** LFA believes that the foundation of any financial plan begins with a clear understanding of the client's everyday spending. To gain this understanding we will together review the client's current income and monthly expenses, establish a budget and spending plan to track against, and provide recommendations and advice on prioritizing how the client's savings should be invested, or how their expenses should be reduced.
- **Emergency Savings:** Establishing an emergency fund with at least six months of take-home pay is one of the most important steps of our financial planning process. Having an emergency fund provides our clients with a sense of security, confidence, and a safety net to fall back on during challenging times. We help each client set up and determine the amount needed in their emergency fund, how and when to fund it, and how to invest it in low-risk assets that will earn them high interest yet still be readily available if needed.
- **Goal Planning:** We will help clients identify specific financial goals and develop defined plans to attain them. Goals could include but are not limited to, saving for a down payment on a home, paying off student loans, graduate school tuition, buying a new car, funding a child's education, or saving for an upcoming wedding or vacation. We will identify what each client wishes to accomplish, create a savings and investment plan to fund each goal, and then track their progress and adjust accordingly if anything may change the timing, need, or desire to achieve each goal.
- **Debt / Loan Management:** Together we will review each client's outstanding loans, including but not limited to, credit cards, student loans, home mortgages, auto loans, and personal loans, and then create a prioritized debt management plan best suited for their needs. We will provide advice on which loans to pay off first and explore the option of refinancing existing debt based on factors such as your credit score, interest rates, maturity dates, and any income tax ramifications. LFA believes that debt with favorable low interest rates can at times be advantageous and utilized to a client's advantage. LFA may recommend mortgage/loan brokers at the client's request.

- **Investment Planning:** This involves a review of a client's current portfolio(s), developing an asset allocation strategy that aligns with their financial goals, time horizon, and risk tolerance, providing information and strategies about investing in stocks, bonds, and mutual funds, reviewing employee retirement plans and stock options, as well as assisting in establishing an investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Leverage Financial Advisory's retirement planning services typically include projections of the likelihood that a client will have enough money to comfortably retire at a desired age. For situations where projections show less than optimal results, we may recommend adjusting certain variables (i.e., working longer, saving more, spending less, taking more risks with investments) that may help improve possible outcomes. If the client is near retirement or already retired, advice may be given on the calculation of RMDs and appropriate investment and distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during their retirement years. We recommend that clients consult with a qualified retirement planning specialist before initiating any retirement planning strategies.
- **Employee Benefits Optimization:** We will provide a review and analysis as to whether each client, as an employee of their organization, is taking maximum advantage of the employee benefits offered to them, such as a 401(k) match or Roth 401(k) offering. If the client is a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals. Please note that if you engage LFA to provide any services for your business, these services will be provided under the terms and conditions of a separate advisory agreement.
- **Insurance Planning:** This involves a review of existing policies to ensure proper coverage for life, health, disability, liability, home, and automobile, as well as a recommendation for any potential savings opportunities. We recommend that all clients consult with a licensed insurance professional before initiating any insurance policy changes. LFA may recommend insurance agents and/or brokers at the client's request.
- **Education Planning:** Includes projecting the amount of funding that will be needed to fund a child's college education, or a client's own graduate, law, or medical school education. Once the funding amount and year the funding will be needed are determined, we will provide recommended tax-advantaged strategies, an automated savings plan, account setup, and investment management. We always recommend that clients also consult with a qualified college funding specialist before initiating any college savings strategies.
- **Credit Score Improvement:** LFA believes that active credit card and credit score management is an integral part of each client's financial health yet is something that is often overlooked. To help mitigate any risk to our client's financial life outside of their investment portfolio, LFA will review each client's current credit (FICO) score and determine if there are any strategies that we can recommend to increase their score. Improving a client's credit score can have a significant impact on building their long-term wealth as it allows them to obtain lower interest rates on auto, home, student, and credit card loans. LFA seeks to achieve a credit (FICO) score of 740 or above for its clients.
- **Credit Card Management:** Credit cards tend to have a bad reputation; however, we believe that credit cards can be powerful wealth-building tools if used wisely. Paying credit card bills in full and on time can help improve our clients' credit scores as well as make them eligible for 1 – 3% in cash back rewards every month. Clients with high credit scores may also be eligible for 0% interest credit cards for up to 21 months in some cases. We will review each client's current credit cards and spending habits and recommend strategies that can be used to leverage their current credit card utilization.
- **Tax Planning:** Advice may include ways to minimize each client's current and future income taxes as a part of their overall financial planning strategy. For example, we may make recommendations on which type of account(s) or specific investments to be owned based on their "tax efficiency," or "tax-deferred status," with consideration that there is always a possibility of future changes to federal, state, and local tax laws and rates that may impact their situation.

We recommend that each client consults with a qualified tax professional before initiating any tax planning strategies and we may provide clients with contact information for accountants or attorneys who specialize in this area. From time to time, we will participate in meetings or phone calls between clients and their tax professionals with their approval or request.

- **Estate Planning:** This typically includes establishing or reviewing each client's current estate plan, which may consist of a will, designated beneficiaries on all their accounts, strategic planning of where assets are located and how they will be distributed, assigned powers of attorney, trusts and potential estate tax liabilities.

We always recommend that clients consult with a qualified attorney when they initiate, update, or complete estate planning activities. We may provide clients with contact information for attorneys who specialize in estate planning. From time to time, we will participate in meetings or phone calls between clients and their attorneys with their approval or request.

### **Retirement Plan Consulting**

Leverage Financial Advisory offers retirement plan consulting services to employer plan sponsors on an ongoing basis. Generally, such consulting services consist of assisting plan sponsors in establishing, monitoring, and reviewing their company's participant-directed retirement plan, such as a 401(k). As the needs of the plan sponsor dictate, areas of advising could include but are not limited to, coordination with plan providers, plan provider cost comparisons, platform comparisons, investment options, plan structure, and participant education.

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

If LFA is engaged to provide investment management or advisory services to such plans, LFA acknowledges its fiduciary standard within the meaning of Sections 3(21) and 3(38) as defined in the Employee Retirement Income Security Act of 1974 ("ERISA"). LFA will not provide plan participants with individualized investment advice unless they engage LFA under a separate stand-alone agreement.

### **Retirement Account Rollovers**

Depending on a client's given circumstances, LFA may recommend that a client rollover retirement plan assets to an Individual Retirement Account (IRA) managed by us. As a result of a rollover, LFA may earn fees on those accounts. This presents a conflict of interest, as LFA has a financial incentive to recommend that a client roll over retirement assets into an IRA we will manage. This conflict is disclosed to clients verbally and in this brochure. Clients are also advised that they are under no obligation to implement the recommendation to roll over retirement plan assets. LFA attempts to mitigate this conflict by utilizing a Held Away Assets Order Management System called Pontera that allows us to actively manage assets in retirement plans outside of our custodian, by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

When LFA provides investment advice to clients regarding retirement plan accounts or individual retirement accounts, LFA and its employees act as fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way LFA generates revenue creates some conflicts with clients' interests, so the firm operates under a special rule that requires LFA and its advisors to act in the best interest of the client and not put any other interest ahead of the client's. Under this special rule's provisions, LFA must:

- Meet a professional standard of care when making investment recommendations (give prudent advice).
- Never put any financial interest ahead of the client's when making recommendations (give loyal advice).
- Avoid misleading statements about conflicts of interest, fees, and investments.
- Follow policies and procedures designed to ensure that LFA and its advisors give advice that is in the best interest of the client.
- Charge no more than is reasonable for services offered; and
- Give clients basic information about conflicts of interest.

Clients should include in their decision-making process a thorough review of all available options, for example:

- Remain invested in the current retirement plan or account (if available).
- Transfer assets to a new employer-sponsored retirement plan (if available).
- Transfer assets to an IRA with a financial institution.
- Withdraw assets directly which would be subject to federal and applicable state and local taxes and possibly subject to the IRS penalty of 10% depending upon the age of the individual.

You must understand the differences between these types of accounts and decide whether a rollover is best for you. Before proceeding, if you have questions contact your advisor, or call our main number as listed on the cover page of this brochure.

### **Third-Party Managers**

When deemed appropriate for the client, LFA may recommend that clients utilize the services of a Third-Party Manager ("TPM") to manage a portion of, or their entire portfolio and financial plan. All TPMs that we recommend must either be registered as investment advisers with the Securities and Exchange Commission or with the appropriate state regulators.

After gathering information about the client's financial situation and objectives, LFA may make recommendations regarding the suitability of a TPM based on, but not limited to, the financial needs, goals, risk tolerance, and investment objectives of the client. Upon selection of a TPM, if applicable, LFA will monitor the TPM to ensure their performance and investment style remain aligned with your investment goals and objectives.

In such circumstances, LFA may receive solicitor fees from the TPM. When appropriate, we may act as the liaison between the client and the TPM in return for an ongoing portion of the advisory fees charged by the TPM. We may also provide ongoing services to the client, including, but not limited to:

- Meet with the client to discuss any changes in goals, objectives, time horizon, or suitability.
- Update the TPM with any changes in client status which is provided to LFA by the client.
- Review and help explain the investments, statements, and notices provided by the TPM to the client.

LFA will provide the client with the TPM's current Form ADV Part 2 and Solicitors Disclosure Statement. Clients placed with a TPM will be billed per the TPM's Fee Schedule, by the TPM, which will be disclosed to the client before signing an agreement with the TPM. This is detailed in Item 10 of this brochure.

### **Third-Party Lending Services**

Our recommended custodian, Interactive Brokers LLC (IB), described in more detail in Item 12 (Brokerage Practices), offers one or more types of securities-backed lending programs. One type is Margin lending - a type of securities-backed lending. In addition to margin lending, IB also offers eligible customers the ability to lend certain of their fully paid and excess margin securities to IB for on-lending to the other IB customers or to other market participants who wish to use these shares for short selling, to make required deliveries or other purposes. "Fully-paid securities" are securities in your account that have been completely paid for. "Excess-margin securities" are any securities in your account that, in aggregate, have a market value that exceeds 140% of your account's debit balance(s). In this disclosure and in relevant agreements, IB collectively refers to fully-paid and excess margin securities as "Fully-Paid Securities" or "Fully-Paid Shares". Lending your Fully-Paid Shares may be a way to increase the yield on your portfolio, because some shares are in high demand in the securities-lending market and borrowers are willing to pay for the use of your shares.

**Securities Loaned Out By You May Not Be Protected by SIPC. The provisions of the Securities Investor Protection Act of 1970 ("SIPA") may not protect you as a lender with respect to securities loan transactions in which you lend your Fully-Paid Securities to IB. Therefore, the collateral delivered to you (and indicated on your account statement) may constitute the only source of satisfaction of IB's obligation in the event that IB fails to return the securities.**

In the IB Stock Yield Enhancement Program, you permit IB to borrow any Fully-Paid Securities in your account and loan these securities out in the securities lending market. By participating in the IB Stock Yield Enhancement Program, you are granting to IB the discretion to borrow your Fully-Paid Securities without contacting you, obtaining your prior approval of any given loan or the amount of interest you will be paid for lending your Fully-Paid Securities. You will still be able to sell any securities in your account at any time, regardless whether they are currently on loan to IB. You will also be able to terminate your participation in the Stock Yield Enhancement Program at any time, automatically terminating any outstanding loans of Fully-Paid Securities. IB will pay you interest in connection with its borrowing of your Fully-Paid Securities. The interest rate IB pays you will approximate a percentage of the net income received by IB for lending your securities. IB's net income may be less than the gross income received by IB for relending your securities because of certain deductions and charges. IB may make certain assumptions in computing net amounts. Not all account types are eligible to participate in this program and each client must individually apply.



LFA receives no compensation should clients choose to use margin (unless the client chooses to invest money borrowed on margin into an investment account managed by LFA). LFA will receive compensation on the interest earned from the Stock Yield Enhancement Program through its advisory fee which is based on the value of the assets in the account, including cash received as interest from the Stock Yield Enhancement Program. Additionally, we do not act as a lender or agent of any lender.

**Margin and other securities-backed lending programs carry substantial risk to account assets since the lenders often have broad rights to liquidate assets and place specific disbursement and investment restrictions on assets in accounts used as loan collateral. We will explain the general details of the particular programs and facilitate use of these lending programs, should a client express interest. However, use of these programs is the account holder's decision.**

**We strongly encourage any client interested in using their account assets as collateral for a loan to understand all the terms and conditions agreed to with the lender.**

### **Hotel and Small Business Consulting**

We are available to assist hotels and small businesses in a variety of ways including business strategy, financial modeling, budgeting, forecasting, cash-flow management, accounting, practice management, general financial advice, and debt management, as well as assisting clients with matters involving their financial institution(s), attorney(s) and/or accounting firm(s).

### **Newsletters**

Newsletters are provided to clients and prospective clients free of charge.

### **Educational Workshops**

Leverage Financial Advisory is sometimes asked to provide speakers for financial educational speaking engagements. Fees for such engagements are negotiated on a case-by-case basis.

### **Advisor Agreements**

Investment supervisory and management services are provided under the terms of a written advisor agreement executed by Leverage Financial Advisory and the client. Implementation of the recommendations made by Leverage Financial Advisory is at the discretion of the client.

### **Clients Tailored Services and Client-Imposed Restrictions**

Leverage Financial Advisory will tailor its advisory services to its client's individual needs and objectives. Clients utilizing our Investment Management service may impose, in writing, reasonable restrictions on investing in certain securities, types of securities, or industry sectors. We offer general investment advice to clients utilizing our Retirement Plan Consulting, Hotel and Small Business Consulting, and Educational Workshop services.

### **Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. Leverage Financial Advisory does not participate in any wrap fee programs.

### **Assets Under Management**

As of December 31, 2023, Leverage Financial Advisory managed \$11,389,795 of client assets. \$10,936,327 were managed on a discretionary basis. \$453,468 were managed on a non-discretionary basis.

## Item 5 Fees and Compensation

### Leverage Financial Advisory offers the following plans for *ongoing* client services:

Investment Management services may include Financial Planning services but are not required to be utilized by the client(s) to receive Investment Management services.

Fees range between 0.50% and 1.00% of the client's combined Assets Under Management (AUM), as well as an Initial Planning Fee ranging from \$2,500 to \$5,000 based on the complexity of the initial financial plan and account setup. Initial Planning Fees are typically higher for married couples.

For high-net-worth individuals and families, fees are tiered and reduced at the following asset levels.

Assets Under Management	Advisory Fees
Less than \$1 Million	1.00%
Between \$1 Million and \$2 Million	0.75%
Greater Than \$3 Million	0.50%

The annual fees are pro-rated and paid in arrears, quarterly, primarily in January, April, July, and October. Fees are withdrawn directly from the client's accounts with the client's written authorization or may be invoiced and billed directly to the client every quarter. Fees are negotiable depending on individual client circumstances. **There is a minimum annual fee of \$2,000 (\$500/quarter) for clients with less than \$200,000 in managed assets, in addition to the Initial Planning Fee.**

Leverage Financial Advisory uses the value of the account(s) as of the last business day of the quarter, or each month within the quarter, for purposes of determining the market value of the assets upon which the advisory fee is based, which will be specified in the client agreement.

For Held Away Accounts managed through Pontera, LFA uses the value of the account(s) as of the last day of each quarter to determine the market value of the assets upon which the advisory fee is based, and Pontera retains a portion of the fee collected by LFA.

All assets held in Client account(s) will be subject to this fee, including assets, such as cash, that are temporarily awaiting investment.

Clients will receive an invoice or statement from Leverage Financial Advisory each time a fee is directly deducted from their account. The Initial Planning Fee is payable upon the execution of a written advisory agreement. Fees may be paid either by check, ACH transfer, or through a third-party payment processor such as Zelle.

Either party may terminate the Investment Management and Financial Planning Agreement with 30 days written notice (including email) to the other party. Upon termination of any service, the fees will be pro-rated and any unearned fees that may have been collected in advance will be refunded to the client. If Investment Management services are terminated during a quarter, fees due are pro-rated based on the period we managed the assets before termination. The date of termination will be used to calculate the final fee payment. Upon termination, we will have no obligation to recommend or take any action with regard to the securities, cash, or other investments in your account(s).

## Retirement Plan Consulting

Retirement Plan Consulting fees are based on a percentage of plan assets or an agreed-upon flat fee, as well as a one-time Initial Plan Setup and Administration fee. The total estimated fees, as well as the ultimate fees charged, are based on the scope and complexity of our engagement with the client. Fees based on a percentage of plan assets will not exceed 1.00%. Initial Plan Setup and Administration fees typically range from \$2,500 to \$5,000. The fee-paying arrangements will be determined on a case-by-case basis and will be detailed in the signed consulting agreement. LFA's fees are in addition to any fees assessed by any mutual funds or ETFs in which plan assets are invested, any fees charged by a third-party investment manager, and any fees charged by the third-party administrator, record keeper, and/or custodian where the plan is held.

Either party may terminate the Retirement Plan Consulting Agreement with 30 days written notice (including email) to the other party. Upon termination of any plan, the fee will be pro-rated and any unearned fee that has been collected in advance will be refunded to the client. If fees are being paid in arrears and the plan is terminated during a billing cycle, fees due are pro-rated based on the period we managed the plan before termination. The date of termination will be used to calculate the final fee payment. Upon termination, we will have no obligation to recommend or take any action with regard to your plan.

## Leverage Financial Advisory offers the following options for *one-time* client services:

### Hourly Engagements

Hourly engagements are for services that are limited in scope, such as assisting someone with their 401(k) allocation. Our hourly rate is \$250 per hour, billed in 15-minute increments, and a partial increment (e.g., ten minutes) will be treated as a whole increment. There is no deposit requirement; the total fee will be due upon delivery of the limited-scope plan or advice and the engagement ends after delivery.

Hourly Services	Advisory Fees
Hourly Rate	\$250
Billing Increments	\$62.50 Per 15 Minutes

All *one-time* limited engagement fees may be paid either by check, ACH transfer, or through a third-party payment processor such as Zelle.

Either party may terminate the One-Time Limited Engagement Agreement upon 5-day's written notice to the other party. Upon termination of any engagement, the fee will be pro-rated based on the work completed, and any unearned fee that has been collected in advance will be refunded to the client. All limited engagements will be completed within 120 days from the date the agreement is signed.

### Fee Discretion

At our discretion, Leverage Financial Advisory may agree to 'household' specific client accounts for purposes of fee calculation depending on the client relationship and overall services provided. The exact services and fees will be agreed upon and disclosed before services are provided. Fees and how they are charged are negotiable. At our discretion, we can charge a lesser investment advisory fee, charge a flat fee, or waive a fee entirely based upon specific facts and circumstances, including but not limited to the client's financial situation and circumstances, the amount of assets under management and anticipated to be under management, account householding arrangements, the complexity of the services provided, grandfathered fee schedules, employees and family members, courtesy accounts, and negotiations with client, etc. In some cases where the advisory relationship changes and the scope of services rendered materially narrows or expands, fees may be adjusted as mutually agreed to and as evidenced by a signed supplemental agreement.

### Additional Client Fees Charged

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that are incurred by the client. Clients may incur certain charges imposed by custodians, custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are in addition to our fees and Leverage Financial Advisory does not receive any portion of these commissions, fees, or expenses.

At no time will Leverage Financial Advisory accept or maintain custody of a client's funds or securities except for authorized fee deductions. The Client is responsible for all custodial, securities, and brokerage execution fees charged by the custodian and executing broker-dealer, as outlined above. Leverage Financial Advisory's fees are separate and distinct from the custodian and execution fees. See Item 12 Brokerage Practices, for further information regarding brokerage and transaction costs.

#### **External Compensation for the Sale of Securities to Clients**

Not applicable to Leverage Financial Advisory or its supervised person(s).

### **Item 6 Performance-Based Fees and Side-by-Side Management**

Leverage Financial Advisory does not charge performance-based fees and therefore does not engage in side-by-side management.

### **Item 7 Types of Clients and Minimum Account Size**

Leverage Financial Advisory generally provides Advisory Services to Individuals, High-Net Worth Individuals, Trusts, and Pension and Profit Sharing Plans. There are no account minimums for any of Leverage Financial Advisory's services.

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

#### **Methods of Analysis**

Leverage Financial Advisory employs what we believe to be an appropriate blend of the following methods of analysis when providing investment advice:

**Technical Analysis:** A method of evaluating securities by analyzing statistical trends and patterns in price and volume data. It relies on charts and mathematical indicators to forecast future price movements, assuming that past market behavior can predict future trends. Technical analysts believe that market psychology and supply/demand dynamics are reflected in price charts, enabling them to identify support and resistance levels, trends, and potential reversal points.

**Fundamental Analysis:** Involves analyzing individual companies and evaluating measurable factors such as revenue growth rates and earnings growth rates.

**Industry Research:** Additionally, in performing our analysis, we may use commercially available information services and financial publications, rating services, market data analytics, research materials provided by various broker-dealers, and other research and tools developed by third-party providers.

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

#### **Investment Strategies**

Generally, our investment advice and management is based on a low-cost globally diversified strategy involving a mid-to-long-term, disciplined approach that manages risk through appropriate asset allocations and tactical portfolio management. We recognize that each client's needs and goals are different; subsequently, portfolio strategies and underlying investment assets may vary. The following are common strategies utilized within our client's portfolios:

**Strategic Asset Allocation:** A long-term investment strategy that involves establishing and maintaining a predetermined mix of asset classes (such as stocks, bonds, commodities, and cash equivalents) in a portfolio based on an investor's financial goals, risk tolerance, and time horizon. It typically involves setting target allocations for each asset class and periodically rebalancing the portfolio to maintain these targets. The goal of strategic asset allocation is to create a diversified portfolio that balances risk and return potential, aiming to achieve the investor's objectives over the long term while minimizing unnecessary trading or market timing decisions.

**Tactical Asset Allocation:** An investment strategy where portfolio weights are adjusted based on short to medium-term market forecasts. Unlike strategic asset allocation, which maintains a fixed allocation over time, tactical allocation involves actively shifting investments to take advantage of perceived opportunities or to mitigate risks. To do so, a temporary shift from the strategic asset allocation target is adjusted. When conditions warrant, the portfolio will return to its target allocation. This approach aims to capitalize on market trends and reduce portfolio volatility. Tactical asset allocation requires ongoing monitoring and analysis of market conditions to make timely adjustments to the portfolio's asset mix.

**Index Investing:** Involves buying a portfolio of securities that mirrors a particular market index, such as the S&P 500. This passive investment strategy aims to match the performance of the index rather than beat it, typically through low-cost index funds or exchange-traded funds (ETFs). By tracking an index, an investment portfolio is typically well diversified and has low turnover (minimal trading/transaction costs), low management fees, and is relatively tax efficient (due to low turnover).

**Core + Explore:** This strategy blends passive (index investing) with active investing, where passive investments make up the majority "core" of a portfolio, and actively managed investments are added as smaller "explore" positions. For example, the core of a portfolio may be built around low-cost globally diversified index funds or ETFs, and the satellite holdings may include active investments such as individual stocks or sector-specific ETFs that are believed capable of adding value.

**Momentum Investing:** An investment strategy that involves buying assets that have shown strong recent performance and selling or avoiding those that have performed poorly. It relies on the belief that assets that have performed well in the past will continue to do so in the near future, while those that have performed poorly will continue to underperform. This approach ignores traditional valuation metrics and instead focuses solely on the trend of price movements.

**Trend Following:** An investment strategy that seeks to capitalize on the persistence of price movements in financial markets. It involves identifying and following prevailing trends, either upward (bullish) or downward (bearish), and investing accordingly. Trend followers typically use technical analysis tools to identify and confirm trends, entering long positions in assets that are rising and avoiding or entering short positions in assets that are falling. This approach assumes that trends will persist over time and aims to capture profits by riding the momentum of these trends while implementing risk management techniques to limit losses during trend reversals.

**Relative Strength:** An investing strategy that involves selecting assets based on their recent performance compared to other assets in the same market or sector. It identifies assets that have outperformed their peers over a specified period and assumes they will continue to outperform. This strategy focuses on the momentum of price movements rather than absolute performance. By comparing the strength of one asset to others in its category, relative strength investing aims to capitalize on trends and rotations within the market by investing in assets showing the strongest relative performance.

**Reversion-To-The-Mean:** An investing strategy based on the belief that asset prices fluctuate around their long-term average or "mean." When prices deviate significantly from this mean, the strategy assumes they will eventually revert back to it. Investors using this approach buy assets that have underperformed relative to their historical average, expecting them to rise, and sell assets that have outperformed, anticipating a decline. Reversion to the mean investing relies on the assumption that extreme deviations from the average are temporary and that prices will eventually return to more typical levels.

**Short-term Trading:** Consists of securities purchased with the expectation that the value of those securities will grow, and be sold, within a relatively short period, generally less than one year, to take advantage of the securities' short-term price fluctuations.

**Long-Term Trading:** Consists of securities purchased with the expectation that the value of those securities will grow over a relatively long period, generally greater than one year.

**Cash Management in Accounts:** We use cash as a strategic asset in tactically managing equity portfolios. As market uncertainty increases, we may raise cash levels in the accounts. A 50-80% cash level is an extreme position, signifying that we are significantly cautious about current market forecasts. We are unlikely to raise cash levels beyond 80%, even in our most cautious market view. Most cash positions will generally range from fully invested (0% cash) to 25% cash, however in most cases, at least a partial cash balance will be maintained so that our firm may debit advisory fees for our ongoing account management services, as applicable.

## **Risk of Loss**

Our judgment about the attractiveness and potential appreciation of a particular asset class or individual security may be incorrect, and there is no guarantee that the securities we select will perform as anticipated. The value of an individual security can be more volatile than the market as a whole, or the anticipated appreciation may fail to produce the intended results. Our estimate of a security's potential appreciation may be wrong or, even if our estimate is correct, may take longer than expected before the value is realized. As a result, there is a risk of loss of the assets we manage that is out of our control. We seek to reduce your risk through diversification. Although we will do our best to manage your assets, we cannot guarantee any level of performance or that you will not experience a loss in your assets.

Investing in securities involves the risk of loss that clients should be prepared to bear. While the stock market may increase and the account(s) could enjoy a gain, it is also possible that the stock market may decrease, and the account(s) could suffer a loss. It is important that clients understand the risks associated with investing in the stock market. Many of these risks apply equally to index funds, ETFs, mutual funds, stocks, bonds, REITs, commodities, and any other types of investments or securities. Material risks associated with our methods of analysis, investment strategies, and types of securities we typically use are listed below:

## **Methods of Analysis Risks**

**Technical Analysis:** The risks of technical analysis include reliance on past price data, susceptibility to false signals, and the subjective interpretation of patterns. Market conditions may change unexpectedly, rendering technical signals ineffective.

**Fundamental Analysis:** The risks of fundamental analysis include incomplete or inaccurate information, unexpected market reactions, and the inability to accurately predict future events or changes in market sentiment. Economic, political, or industry shifts can also undermine the validity of fundamental assessments.

**Industry Research:** Our methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information that we use for our research, analysis, and guidance, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

## **Investment Strategies Risks**

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

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

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

**Tactical Management Risk:** The risk of tactical asset allocation lies in incorrect timing or execution of market adjustments. Making frequent changes to asset allocations based on short-term forecasts can result in potential missed opportunities if market predictions are inaccurate. Additionally, rapid adjustments may lead to higher portfolio turnover and tax implications.

**Momentum Risk:** The primary risk of momentum investing is the potential for rapid and significant reversals in asset prices, leading to losses. Momentum strategies rely on the continuation of trends, but markets can change direction suddenly, causing previously high-performing assets to decline sharply. Additionally, crowded trades and overvaluation may increase the risk of sharp corrections.

**Concentration Risk:** Certain investment strategies focus on overweighting a portfolio to a particular asset class, industry, sector, or type of investment. From time to time, these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Whipsaw Risk:** Occurs when markets recover quickly while the strategy remains invested in defensive assets such as cash or certain bond funds, thereby not participating in the market's recovery. Our investment strategies take positions in cash or similar lower-volatility securities like ultra-short-term bond funds in an effort to minimize market losses and volatility. This can result in instances where the market recovers while the strategy remains invested in cash or bond positions.

**Sector Risk:** Some ETFs and mutual funds limit their exposure to a specific sector. Daily fluctuations in specific market sectors are often more extreme than fluctuations in the overall market.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains that could increase taxes. These factors may negatively affect the account's performance.

**Limited Markets Risk:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed-income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Political Risk:** The risk of financial and market loss due to political decisions or disruptions in a particular country or region. May also be known as geopolitical risk.

**Legal or Legislative Risk:** Legislative changes and/or court rulings may impact the value of investments, tax implications of certain strategies, and industry-specific future earnings (for example: the manufacturing industry having new environmental regulations that increase costs).

**Small and Medium-Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium-cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

**Third-Party Managers Risk:** The risks associated with utilizing TPMs include manager risk where the TPM fails to execute their stated investment strategy, business risk if the TPM has financial or regulatory issues, and risks associated with the investment strategies of the TPM, disclosed in the TPM's Form ADV Part 2.

## Risks of Specific Securities Most Commonly Used

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to a stock. Investing in ETFs carries the risk of capital loss. Areas of concern include the lack of transparency in portfolios, increasing complexity, high management fees, and the possibility of inadequate regulatory compliance. ETF prices may vary significantly from their underlying Net Asset Value due to market conditions, and certain exchange-traded funds may not track underlying benchmarks as advertised.

ETFs are also subject to the following risks: (1) an ETF's shares may trade at a market price that is above or below their net asset value; (2) the ETF may employ an investment strategy that utilizes high leverage ratios; or (3) trading of an ETF's shares may be halted or de-listed from an exchange if the listing exchange's officials deem such action appropriate. The advisor has no control over the risks taken by the underlying funds in which clients invest.

**Discount/Premium to NAV:** Generally, ETF shares trade at or near their most recent net asset value (NAV). The NAV represents the value of each share's portion of the fund's underlying assets and cash at the end of the trading day. The NAV is generally calculated at least once daily for indexed-based ETFs and potentially more frequently for actively managed ETFs. However, certain inefficiencies in the markets may cause the shares to trade at a premium or discount to the NAV.

**Index Tracking Error:** This is the extent to which any ETF deviates from the index that it is set up to mimic. Managing this is a key job for the manager of the fund, and how they have performed is something for the client to look at by comparing the fund's record with the selected index in the fund documents or on the manager's website. Some asset classes, such as emerging markets, are likely to demonstrate more tracking errors than others.

**Liquidity/Shutdown:** There is no guarantee that an active secondary market for an ETF will develop or continue to exist. Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to sell those shares. If an ETF becomes very unpopular and has minimal demand, the fund can be shut down and liquidated. When the fund is liquidated shareholders are paid in cash and transaction costs and capital gains/losses can be incurred. **Authorized Participants (APs):** One of the major parties at the center of the creation and redemption process for ETFs. They provide a large portion of liquidity in the ETF market by obtaining the underlying assets required to create a fund. Traditionally, APs are large banks such as JP Morgan Chase, Bank of America, Goldman Sachs, and Morgan Stanley, among others. If there is a credit or liquidity crisis, ETFs bear the risk of failure due to the potential non-participation of their APs.

When a client invests in ETFs, the client indirectly pays its proportionate share of any fees and expenses of those funds (management fees, administrative costs, etc.). Therefore, in some funds, clients may incur high expenses. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

**Bond ETFs:** Bond ETFs carry several risks, including interest rate risk, credit risk, and liquidity risk. Interest rate risk arises from fluctuations in interest rates, impacting the bond prices inversely. Credit risk involves the possibility of bond issuers defaulting on payments. Liquidity risk refers to difficulties in buying or selling bonds at desired prices due to insufficient market activity. Additionally, bond ETFs may be subject to tracking error risk, where the ETF's performance deviates from its underlying index.

**Commodity ETFs:** A commodity ETF is an exchange-traded fund (ETF) invested in physical commodities, such as agricultural goods, natural resources, and precious metals. A commodity ETF is usually focused on either a single commodity held in physical storage or investments in commodities futures contracts. Other commodity ETFs track the performance of a broad commodity index which includes many individual commodities representing a combination of physical storage and derivatives positions.

Commodity ETFs, while offering diversification and accessibility to commodity markets, pose risks. These include volatility due to commodity price fluctuations, tracking error between ETF performance and underlying commodity prices, and the risk of contango or backwardation in futures markets affecting returns. Additionally, commodity ETFs may face regulatory changes, liquidity issues, and geopolitical factors impacting commodity markets. Some commodity ETFs, such as those that hold precious metals directly, have higher capital gains tax rates because tax rules treat these ETFs as collectibles.



**Leveraged or Inverse ETFs:** Leveraged ETFs seek to deliver multiples of the performance of the index or benchmark they track. Inverse ETFs (also called “short” funds) seek to deliver the opposite of the performance of the index or benchmark they track. Both leveraged and inverse ETFs pursue a range of investment strategies including investments in high-risk financial instruments like swaps, futures contracts, and other derivative contracts/arrangements. Most leveraged and inverse ETFs “reset” daily, meaning that they are designed to achieve their stated objectives on a daily basis. Their performance over longer periods of time can differ significantly from the performance (or inverse of the performance) of the underlying index or benchmark during the same time. Such price volatility is amplified in volatile markets. Additionally, in most cases, leveraged or inverse ETFs are less tax-efficient because daily resets can cause the ETF to realize significant short-term capital gains that are not offset by a loss.

**Cryptocurrency ETFs:** Cryptocurrency ETFs introduce various risks for investors. Market volatility is a significant concern due to the unpredictable nature of cryptocurrencies, which can lead to rapid price swings and potential losses. Regulatory uncertainty is another risk, as government interventions or changes in cryptocurrency regulations can impact ETF performance and legality. Moreover, the decentralized nature of cryptocurrencies exposes ETFs to cybersecurity threats such as hacking and theft, jeopardizing investors' assets.

Additionally, cryptocurrencies lack intrinsic value, making their prices highly speculative and vulnerable to manipulation. This speculative nature increases the risk of significant losses for ETF investors, especially during periods of extreme market volatility. Furthermore, the complexity of the cryptocurrency market, including issues like liquidity constraints and operational risks, can amplify risks associated with ETF investments.

Investors must carefully consider these risks before investing in cryptocurrency ETFs and ensure they have a thorough understanding of the market dynamics, regulatory environment, and cybersecurity measures in place. Diversification and risk management strategies are crucial to mitigate the inherent risks associated with cryptocurrency ETFs and protect investors' capital.

An investment in Cryptocurrency ETFs is suitable only for clients wishing to have an allocation to an investment with a speculative objective who can bear the economic risk of the investment, who have no need for liquidity, who understand the risks, and who are willing to accept those risks of loss of their entire investment in exchange for potential returns. The value of Cryptocurrency ETFs can change constantly and dramatically. If the value goes down, there's no guarantee that it will rise again. Investors should be prepared for volatile market swings. As a result, there is a significant risk of loss of your entire principal investment. Interests should not be purchased by any person who cannot afford the loss of their entire investment.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss. All mutual funds have costs that lower investment returns. The funds can be comprised of bonds “fixed income” (lower risk), stocks “equity” (higher risk), or a combination of both. Mutual funds are typically diversified portfolios but can be negatively impacted by industry and/or market downturns, among other things. When a client invests in mutual funds, the client indirectly pays its proportionate share of any fees and expenses of those funds (management fees, sales commissions, etc.). Therefore, in some funds, clients may incur high expenses. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

**Stocks (Equities):** An investment that generally refers to buying shares of common stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate dramatically in response to specific situations for each company, industry, and/or the general economic environment; and in the event of an issuer's bankruptcy or restructuring, a stock could lose all of its value.

**Real Estate Investment Trusts (REITs):** Risks involved in REIT investing may include a lack of a public market in certain issues, limited liquidity and transferability, fluctuations involving the value of the assets within the REIT, a reliance on the investment manager to select and manage assets, changes in interest rates, laws, operating expenses, and insurance costs, tenant rent delinquencies and/or turnover, and the impact of current market conditions.

**Non-U.S. Investments:** International and emerging market investments present certain additional risks such as currency fluctuation, political and economic change/uncertainty, social unrest, changes in government regulations, differences in accounting, and a lesser degree of accurate public information available.

**American Depositary Receipts (ADRs):** Negotiable certificates issued by a U.S. depository bank representing a specified number of shares—usually one share—of a foreign company's stock. The ADR trades on U.S. stock markets as any domestic shares would. ADRs offer U.S. investors a way to purchase stock in overseas companies that would not otherwise be available. Investing in an ADR may incur additional fees that are not charged for domestic stocks. The depository bank that holds the underlying stock may charge a fee, known as a custody fee, to cover the cost of creating and issuing an ADR. Holders of ADRs realize any dividends and capital gains in U.S. dollars. However, dividend payments are net of currency conversion expenses and foreign taxes. The main problems associated with ADRs are that they may involve double taxation—locally and abroad—and how few companies are listed. Unlike domestic companies, there are a limited number of foreign entities whose ADRs are listed for the public to trade. Some ADRs may not comply with SEC regulations. These are called unsponsored ADRs, which have no direct involvement by the company. Although investors can avoid any direct risks that come with currency exchange, they may incur currency conversion fees when investing in ADRs. These fees are established to directly link the foreign security and the one traded on the domestic market.

**Bonds (Fixed Income):** Investments that generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, money market funds, commercial paper, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed-income market is volatile, and fixed-income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities). Fixed-income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation-protected/inflation-linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value.

**Municipal Bonds:** Debt obligations generally issued to obtain funds for various public purposes, including the construction of schools, roads and public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-exempt status, investors should compare their relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in fixed income/bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Money Market Funds:** The primary risk associated with money market funds is the potential for a decrease in the value of the fund's assets, known as net asset value (NAV) per share, which can occur due to changes in interest rates, the credit quality of the underlying securities, or liquidity constraints. While money market funds are considered relatively safe investments compared to stocks or bonds, they are not entirely risk-free. In rare cases, a money market fund's NAV may fall below \$1 per share, a situation known as "breaking the buck," which can result in losses for investors.

Money market funds are not FDIC-insured. Unlike bank deposits, which are backed by the Federal Deposit Insurance Corporation (FDIC) up to certain limits, money market funds are investment products that invest in short-term, low-risk securities such as Treasury bills and commercial paper. While money market funds strive to maintain a stable net asset value (NAV) of \$1 per share, they are not guaranteed by the government, and there is a possibility that the value of the fund may fluctuate. Investors in money market funds are subject to the risk of loss of principal.

**Bank Obligations:** Include bonds and certificates of deposits (CDs) that may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

**Options and other Derivatives:** Includes puts, calls, and warrants that carry many unique risks, including time-sensitivity, and can result in the complete loss of principle. Their value is based on the performance of an underlying asset, such as stocks, commodities, or currencies. The risk can come from various factors, including market fluctuations, changes in interest rates, or unexpected events.

## Item 9 Disciplinary Information

Neither Leverage Financial Advisory nor its management person has had any legal or disciplinary events, currently or in the past.

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

### **Broker-Dealer or Representative Registration**

Leverage Financial Advisory is not a broker-dealer nor is its management person a registered representative of a broker-dealer.

### **Futures or Commodity Registration**

Leverage Financial Advisory does not have an application pending as a futures commission merchant, commodity pool operator, or a commodity trading advisor, or as an associated person of the foregoing entities.

### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Leverage Financial Advisory does not currently have any relationships or arrangements that are material to its advisory business or clients with either a broker-dealer, municipal securities dealer, government securities dealer or broker, investment company, or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund” and offshore fund, other investment advisor or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer or sponsor of syndicator of limited partnerships.

### **Recommendation or Selection of Other Investment Advisers and Conflicts of Interest**

In certain situations, Leverage Financial Advisory solicits the services of Third-Party Managers (TPMs) to manage all or a portion of client accounts and financial plans. In such circumstances, LFA may receive solicitor fees from the TPM by receiving an ongoing portion of the advisory fees charged by the TPM. LFA is responsible for delivering Form ADV Part 2 and the Solicitors Disclosure Statement of the TPM to the client.

Clients placed with TPMs will be billed per the TPM’s fee schedule, by the TPM, which will be disclosed to the client before signing an agreement with the TPM. When referring clients to a TPM, the client’s best interests will be the main determining factor of LFA.

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

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

### **Code of Ethics Description**

Leverage Financial Advisory is registering as a state registered investment advisor with the Commonwealth of Massachusetts securities regulators. The firm has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the firm. In addition, the Code of Ethics governs personal trading by each employee of the firm deemed to be an access person and is intended to ensure that securities transactions effected by access persons of the firm are conducted in a manner that avoids any conflict of interest between such persons and clients of the firm or its affiliates. The firm collects and maintains records of securities holdings and securities transactions affected by access persons. These records are reviewed to identify and resolve conflicts of interest. A copy of LFA’s Code of Ethics is available upon request.

### **Firm Recommendations and Conflicts of Interest**

Our firm recognizes that the personal investment transactions of our representatives demand the application of a Code of Ethics with high standards and requires that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, our firm also believes that if investment goals are similar for clients and our representatives, it is logical, and even desirable, that there may be common ownership of some of the same securities.

### **Investment Recommendations Involving a Material Financial Interest**

Leverage Financial Advisory and its related persons do not recommend, buy, or sell for client accounts, securities in which our firm or a related person has a material financial interest without prior disclosure to the client.

### **Personally Investing in the Same Securities Recommended to Clients**

Leverage Financial Advisory and its related persons may invest in the same securities that are also recommended to clients. This may provide an opportunity for related persons of LFA to buy or sell securities before or after recommending the same securities to clients, resulting in the related persons profiting off the recommendations they provide. To minimize this potential conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics. LFA will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the disadvantage of clients when similar securities are being bought or sold.

### **Trading Securities at or About the Same Time as Clients' Securities**

Leverage Financial Advisory and its related persons may buy or sell securities for themselves at or about the same time they buy or sell the same securities for client accounts. This may provide an opportunity for related persons to profit from the trades they execute for clients. To minimize this potential conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics. Additionally, securities typically recommended by LFA are widely held and publicly traded. Should a conflict occur because of materiality (i.e., a thinly traded stock), disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (i.e., a purchase or sale that is minimal in relation to the total outstanding value, and as such would have a negligible effect on the market price), would not be disclosed at the time of trading. LFA will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the disadvantage of clients when similar securities are being bought or sold.

## **Item 12 Brokerage Practices**

### **Factors Used to Select Broker-Dealers for Client Transactions**

If requested by the client, Leverage Financial Advisory will recommend custodians and/or broker-dealers to be used based on their financial strength, integrity, stability, cybersecurity, execution, custodial services offered, cost, quality of service, and industry reputation. LFA will also consider factors such as commission prices, speed and quality of execution, client management tools, and convenience of access for both the advisor and client in making its suggestion. Leverage Financial Advisory generally recommends Interactives Brokers LLC to act as the custodian for client accounts.

### **Research and Other Soft Dollar Benefits**

Leverage Financial Advisory does not receive research or other products or services other than execution from a broker-dealer or third party as a result of client securities transactions.

### **Brokerage for Client Referrals**

Leverage Financial Advisory does not receive client referrals from any broker-dealer or third party as a result of the firm selecting or recommending that broker-dealer to clients.

### **Directed Brokerage**

Leverage Financial Advisory does not require that a client direct it to execute transactions through a specified broker-dealer.

### **If the firm permits a client to direct brokerage, describe your practice**

Leverage Financial Advisory will allow clients to direct brokerage at the advisor's sole discretion. Clients need to be aware that if they direct LFA to a particular broker-dealer for execution, the advisor may not be able to achieve the most favorable execution of client transactions. Directing brokerage may cost clients more money than if LFA were to execute transactions at the broker-dealer it recommends and/or has an established relationship.

### **Aggregating Securities Transactions for Client Accounts**

If Leverage Financial Advisory buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution (this practice is commonly referred to as "block trading"). In such cases, LFA would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this practice. LFA would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

### **Trade Errors**

On occasion, an error may be made by LFA or the custodian in a client's account. For example, a security may be erroneously purchased for a client account instead of sold. In these situations, we generally seek to correct the error by placing the client account in a similar position as it would have been had there been no error, at no cost to the client. Depending on the circumstances, corrective steps may be taken, including but not limited to, canceling the trade, adjusting an allocation, and/or crediting the customer's account or quarterly advisory fees. In the event the trading error results in a profit, the profit is retained by the client.

## **Item 13 Review of Accounts**

### **Account Reviews**

All Ongoing Investment Advisory and Financial Planning client accounts are monitored on an ongoing basis. Client accounts are reviewed by Leverage Financial Advisory's Principal, Brian Bond. The nature of these reviews is to determine if the clients' accounts are still in line with their stated goals and objectives. We generally do not deliver written reports in conjunction with our account reviews.

We review accounts for our Retirement Plan Consulting clients on at least an annual basis. The nature of these reviews is to determine if the clients' accounts are still in line with their stated goals, objectives, and investment policies, if applicable. We generally do not deliver written reports in conjunction with our account reviews.

One-time written Financial Plans and/or Hourly Engagements, once prepared and delivered to the client, are not reviewed again unless the client requests the financial plan to be updated.

Additional reviews may be triggered by material market, economic, or political events, or by changes in clients' financial situations (such as a job promotion, marriage, child being born, physical move, or inheritance). Clients are encouraged to notify Leverage Financial Advisory if changes occur that might materially affect their financial plans.

### **Account Statements & Reports**

Clients are provided with transaction confirmation notices and regular summary account statements at least quarterly, directly from the financial institutions/custodians where their assets are held. From time to time or as otherwise requested, clients may also receive written or electronic reports from LFA, which contain certain account and/or market-related information. Clients should compare the account statements they receive from their financial institutions/custodians with any documents or reports they receive from LFA and inform LFA of any discrepancies.

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

### **Economic Benefits Provided to the Advisory Firm From External Sources and Conflicts of Interest**

As disclosed in Item 10 above, Leverage Financial Advisory may receive a portion of the annual management fees collected by the TPM(s) where LFA refers clients. This situation creates a conflict of interest because LFA and/or its advisors have an incentive to decide which TPMs to use because of the higher solicitor fees to be received by LFA. However, when referring clients to a TPM, the client's best interests will be the main determining factor of LFA.

### **Advisory Firm Payments for Client Referrals**

Leverage Financial Advisory may enter into agreements with individuals and organizations, which may be affiliated or unaffiliated with LFA, that refer clients to LFA in exchange for compensation. All such agreements will be in writing and comply with the requirements of Federal or State regulation. If a client is introduced to LFA by a solicitor, LFA may pay that solicitor a fee. While the specific terms of each agreement may differ, generally, the compensation will be based upon LFA's engagement of new clients and is calculated using a varying percentage of the fees paid to LFA by such clients. Any such fee shall be paid solely from LFA's advisory fee and shall not result in any additional charge to the client.

Each prospective client who is referred to LFA under such an arrangement will receive a copy of this brochure and a separate written disclosure document outlining the nature of the relationship between the solicitor and LFA and the amount of compensation that will be paid by LFA to the solicitor. The solicitor is required to obtain the client's signature acknowledging receipt of LFA's ADV Part 2 disclosure brochure and the Solicitor's Disclosure Statement.

### **Item 15 Custody**

Under state regulations, Leverage Financial Advisory is deemed to have custody of a client's assets if a client authorizes LFA to instruct their qualified custodian to deduct LFA's advisory fees directly from their account. The qualified custodian utilized by LFA and the client maintains actual custody of client assets. The client will receive written statements no less than quarterly from the custodian. Leverage Financial Advisory will also send a quarterly invoice or statement to the client, as well as the custodian, outlining the amount of the advisory fee to be deducted from the client's account. LFA encourages clients to carefully review their account statements and firm invoices for any inaccuracies. Any discrepancies should be immediately brought to the firm's attention.

### **Item 16 Investment Discretion**

Leverage Financial Advisory provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, LFA generally manages the client's account(s) and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought or sold, what securities to buy or sell, or the price per share. In some instances, LFA's discretionary authority in making these determinations may be limited by conditions imposed by a client, in writing (in written investment guidelines or objectives, or written client instructions otherwise provided to LFA). In instances where Leverage Financial Advisory does not have discretionary authority over the selection and amount of securities to be bought or sold in the client account(s), the advisor will obtain the prior consent and approval from the client for each transaction effected in the client account. The client is not required to follow any recommendations made by LFA.

For Retirement Plan Consulting clients, Leverage Financial Advisory may provide investment advisory services on a non-discretionary basis. Before providing its advisory services to a qualified retirement plan, LFA must be appointed as either a 3(21) Investment Advisor or 3(38) Investment Manager by the plan sponsor acting as the named co-fiduciary of a qualified retirement plan and enter into an investment management agreement or other agreement which sets forth the scope of LFA's services. LFA may also assist plan sponsors in a non-discretionary capacity in selecting, recommending, and communicating with a third-party Investment Manager for their plan. In choosing a menu of investments for each plan client, LFA is deemed to be a "discretionary investment manager" for purposes of ERISA and has the discretion to add or delete funds within each plan's investment "menu." However, LFA does not manage any accounts with discretion, nor does it provide any individualized investment advice to plan participants unless they engage LFA under a separate stand-alone agreement. Within each plan, the accounts are managed and controlled by each plan participant who can choose their own investments from the investment menu.

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

Leverage Financial Advisory will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## Item 18 Financial Information

### Balance Sheet

Leverage Financial Advisory does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance, therefore a balance sheet is not included with this brochure.

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

In instances where Leverage Financial Advisory has discretionary authority over client accounts, the advisor is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If LFA does become aware of any such financial condition, this brochure will be updated, and clients will be notified.

### Bankruptcy Petitions During the Past Ten Years

Not applicable to Leverage Financial Advisory.

## Item 19 Requirements for State-Registered Advisers

### Principal Executive Officers and Management Persons

Brian Bond

Born 1985

### Educational Background

Boston University, BS Hospitality Administration, *Cum Laude*, 2007

Boston University, Master of Business Administration, Concentration in Finance, *High Honors*, 2016

Boston University, Certificate in Financial Planning, 2020

### Business Experience

Pyramid Hotel Group, Financial Analyst, 2007 - 2008

Pyramid Hotel Group, Assistant Controller, Sheraton Hotel, 2008 - 2009

Premak, Inc., The Beacon Inn, General Manager, 5/2009 - 11/2009

Hotel Commonwealth, Assistant Controller, 2009 - 2012

Sage Hospitality, Director of Finance, Hotel Commonwealth, 2012 – 3/2021

Boston University, Adjunct Professor, Finance & Accounting, 2018 - 2022

Leverage Financial Advisory, Principal – Personal Financial Planner & Investment Advisor, 2018 – Present

### Professional Designations, Licensing & Exams

**Chartered Market Technician® (CMT):** The Chartered Market Technician® (CMT) credential is awarded to those who demonstrate mastery of a core body of knowledge of investment risk in portfolio management. The Chartered Market Technician® (CMT) designation marks the highest education within the discipline and is the preeminent designation for practitioners of technical analysis worldwide.

### Other Business Activities

Mr. Bond owns and manages a residential real estate rental property. He spends approximately four to ten hours per month on this activity.

**Performance Based Fee Description**

Not applicable to Leverage Financial Advisory.

**Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons**

Management of Leverage Financial Advisory has not been found liable in any arbitration, civil or disciplinary actions or administrative proceedings.

**Material Relationships Maintained by this Advisory Business or Management Persons with Issuers of Securities**

There are no material relationships maintained by Leverage Financial Advisory or its management person with any issuers of securities other than as described in this Brochure.

Massachusetts's law (950 CMR 12-205(9)(C) 13 MGL 110A) prohibits Leverage Financial Advisory from disclosing the nonpublic personal information about clients to other third parties unless Leverage Financial Advisory has prior written consent. If clients decide at some point to either terminate Leverage Financial Advisory's services or become an inactive customer, Leverage Financial Advisory will continue to adhere to this privacy policy.

**\*\*\* NOTICE TO MASSACHUSETTS CLIENTS \*\*\***

A disciplinary history of the Registrant or its representatives, if any, can be obtained by calling the Massachusetts Securities Division at (617) 727-3548.



## Privacy Policy



**EFFECTIVE: MARCH 25, 2024**

### OUR COMMITMENT TO YOU

Leverage Financial Advisory (“LFA”) is committed to safeguarding the use of your personal information that we have as your Investment Advisor. LFA (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does LFA provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used is set forth in this privacy policy.

### THE INFORMATION WE COLLECT ABOUT YOU

You typically provide personal information when you complete the paperwork required to become our client. This information includes the following:

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
E-mail Address(es)	Investment Activity and Goals
Account Information (including other institutions)	Investment Experience and Risk Assessment

In addition, we collect non-public information about you from the following sources:

Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents.

Information we receive while establishing a customer relationship including, but not limited to, applications, forms, and investment questionnaires.

Information about your transactions with us or others.

## **INFORMATION ABOUT YOU THAT LEVERAGE FINANCIAL ADVISORY SHARES**

Leverage Financial Advisory works to provide products and services that benefit our customers. Some of these services require access to your personal information such as bank accounts, brokerage accounts, your date of birth, etc. We do not disclose the identity, affairs, or investments of any client to any third party unless required by law to do so, or unless consented to by the client in writing. Upon receiving written consent by the client through our "Opt-In Provision" within our client contracts, we share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law.

We also disclose non-public personal information to other financial institutions with whom we have joint business arrangements with for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information will also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy Leverage Financial Advisory's regulatory obligations and is otherwise required or permitted by law. Lastly, we will disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific services we have requested.

We do not sell your non-public personal information to anyone.

## **INFORMATION ABOUT FORMER CLIENTS**

Leverage Financial Advisory does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

## **CONFIDENTIALITY AND SECURITY**

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural, and electronic safeguards in an effort to protect the information from access by unauthorized parties.

## **WE'LL KEEP YOU INFORMED**

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy 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 non-public 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. You can obtain a copy of our current privacy policy by contacting us at (617) 356-1852.



Brian Bond, Principal  
Personal CRD #7046853

Leverage Financial Advisory, LLC  
10 Middlesex Avenue, Unit 1  
Wilmington, MA 01887

Tel: (617) 356-1852

info@leverageadvisory.com  
[www.leverageadvisory.com](http://www.leverageadvisory.com)

**Item 1 Form ADV Part 2B - Brochure Supplement**

Firm CRD #299507

March 25, 2024

This brochure supplement provides information about Brian Bond that supplements the Leverage Financial Advisory brochure. You should have received a copy of that brochure. Please contact Brian Bond if you did not receive Leverage Financial Advisory's brochure or if you have any questions about the contents of this supplement.

Additional information about Brian Bond, CRD #7046853 is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Educational Background/Business Experience

Brian Bond

Born 1985

### Educational Background

Boston University, BS Hospitality Administration, *Cum Laude*, 2007

Boston University, Master of Business Administration, Concentration in Finance, *High Honors*, 2016

Boston University, Certificate in Financial Planning, 2020

### Business Experience

Pyramid Hotel Group, Financial Analyst, 2007 - 2008

Pyramid Hotel Group, Assistant Controller, Sheraton Hotel, 2008 - 2009

Premak, Inc., The Beacon Inn, General Manager, 5/2009 - 11/2009

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Sage Hospitality, Director of Finance, Hotel Commonwealth, 2012 – 3/2021

Boston University, Adjunct Professor, Finance & Accounting, 2018 - 2022

Leverage Financial Advisory, Principal – Personal Financial Planner & Investment Advisor, 2018 – Present

### Professional Designations, Licensing & Exams

**Chartered Market Technician® (CMT):** The Chartered Market Technician® (CMT) credential is awarded to those who demonstrate mastery of a core body of knowledge of investment risk in portfolio management. The Chartered Market Technician® (CMT) designation marks the highest education within the discipline and is the preeminent designation for practitioners of technical analysis worldwide.

## Item 3 Disciplinary Information

There are no legal or disciplinary events or proceedings to report concerning Mr. Bond.

### Description of a professional attainment, designation, or license being revoked or suspended.

Not applicable to Mr. Bond.

## Item 4 Other Business Activities

Mr. Bond owns and manages a residential real estate rental property. He spends approximately four to ten hours per month on this activity.

## Item 5 Additional Compensation

Mr. Bond does not receive compensation or other economic benefits from anyone for providing advisory services other than what has been described in the Leverage Financial Advisory Brochure.

## **Item 6 Supervision**

Brian Bond is the Principal and Chief Compliance Officer of Leverage Financial Advisory. He will adhere to Leverage Financial Advisory's compliance program and Code of Ethics on an ongoing basis. He is the only individual that provides investment advice to clients. Brian Bond's contact information is on the cover page of this disclosure document.

## **Item 7 Requirements for State-Registered Advisers**

Mr. Bond has not been involved in an award or found liable in an arbitration claim, civil, or self-regulatory organization event or administrative proceeding, or been the subject of a bankruptcy petition.

**Table of Fees for Services**

Carefully read Item 4 and Item 5 of Form ADV Part 2A (“Brochure”), as these sections of the Brochure contain important details about Leverage Financial Advisory, LLC advisory services and fees. Fees may be negotiable. The fees below will only apply to you when you request the services listed.

<b>Fees Charged by Investment Advisor</b>	<b>Fee Amount</b>	<b>Frequency Fee is Charged</b>	<b>Services</b>
Assets Under Management Fee	0.50% - 1.00% Minimum Fee \$500 Per Quarter	Monthly / Quarterly in Arrears	Portfolio management for individuals and/or small businesses; Financial planning services; Pension consulting services
Hourly Fee	\$250	½ Upfront, Balance at Completion	Portfolio management for individuals and/or small businesses; Financial planning services; Pension consulting services; and Educational seminars/workshops
Subscription Fee	\$0	n/a	n/a
Fixed Fee	\$2,500 - \$5,000	Upfront	Portfolio management for individuals and/or small businesses; Financial planning services; Pension consulting services; and Educational seminars/workshops
Commission to the Advisor	\$0	n/a	n/a
Performance-based Fee	\$0	n/a	n/a
Other – Assets Under Consultation	0.50% - 1.00%	Monthly / Quarterly	Pension consulting services
<b>Fees Charged by Third Parties</b>	<b>Fee Amount</b>	<b>Frequency Fee is Charged</b>	<b>Services</b>
Third Party Money Manager	0.10% - 1.50%	Monthly / Quarterly	Portfolio management for individuals; Financial planning services; Pension consulting services;
Robo-Advisor Fee	\$0	n/a	n/a

**Talk with your Advisor about fees and costs applicable to you**

**Additional fees and costs to discuss with your Advisor**

<b>Additional Fees/Costs</b>	<b>Yes/No</b>	<b>Paid To</b>
Brokerage Fees	Yes	Interactive Brokers LLC
Commissions	Yes	Interactive Brokers LLC
Custodian Fees	Yes	Interactive Brokers LLC
Mark-Ups	Yes	Interactive Brokers LLC
Mutual Fund/ETF Fees and Expenses	Yes	Each exchange-traded fund (ETF) and mutual fund manager has their own underlying investment fees and expenses typically referred to as the “expense ratio”. More information regarding such fees is available in each security prospectus.

Effective March 25, 2024