818 Wealth, LLC dba Moffatt Financial Strategies Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Moffatt Financial Strategies. If you have any questions about the contents of this brochure, please contact us at (682) 747-0134 or by email at:derek@moffattfs.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Moffatt Financial Strategies is also available on the SEC's website at www.adviserinfo.sec.gov. Moffatt Financial Strategies' CRD number is: 335975.

425 Houston Street Suite 575
Fort Worth, TX 76102
(682) 747-0134
derek@moffattfs.com
https://moffattfinancialstrategies.com

Registration as an investment adviser does not imply a certain level of skill or training.

Version Date: 03/23/2026

Item 2: Material Changes

Moffatt Financial Strategies has the following material changes to report. Material changes relate to Moffatt Financial Strategies' policies, practices or conflicts of interest.

- Moffatt Financial Strategies has successfully transitioned to formal registration with the Securities and Exchange Commission from its previous registration at the state level.
- Moffatt Financial Strategies does not participate in a Wrap Fee Program. (Item 4)
- Moffatt Financial Strategies has updated its Assets Under Management. (Item 4.E)
- Moffatt Financial Strategies has disclosed its use of third-party advisers and applicable fees. (Items 4, 5, and 10)
- Moffatt Financial Strategies has added Fidelity Brokerage Services as a custodian. (Item 12)

Item 3: Table of Contents

Item 1: Cover Page
Item 2: Material Changes ii
Item 3: Table of Contents iii
Item 4: Advisory Business 2
Item 5: Fees and Compensation 5
Item 6: Performance-Based Fees and Side-By-Side Management 9
Item 7: Types of Clients 10
Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss 10
Item 9: Disciplinary Information 14
Item 10: Other Financial Industry Activities and Affiliations 14
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading 16
Item 12: Brokerage Practices 17
Item 13: Review of Accounts 19
Item 14: Client Referrals and Other Compensation 20
Item 15: Custody 21
Item 16: Investment Discretion 21
Item 17: Voting Client Securities (Proxy Voting) 21
Item 18: Financial Information 22

Item 4: Advisory Business

A. Description of the Advisory Firm

818 Wealth, LLC dba Moffatt Financial Strategies (hereinafter "MFS") is a Limited Liability Company organized in the State of Texas. The firm was formed in March 2025, and the principal owner is Derek Jefferson Moffatt.

B. Types of Advisory Services

Portfolio Management Services

MFS offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. MFS creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

MFS evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. MFS will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

MFS seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of MFS's economic, investment or other financial interests. To meet its fiduciary obligations, MFS attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, MFS's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is MFS's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

Pension Consulting Services

MFS offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Selection of Other Advisers

MFS may direct clients to third-party investment advisers. Before selecting other advisers for clients, MFS will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where MFS is recommending the adviser to clients.

Services Limited to Specific Types of Investments

MFS generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities, non-U.S. securities, venture capital funds and private placements. MFS may use other securities as well to help diversify a portfolio when applicable.

Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are 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 we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);

- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

C. Client Tailored Services and Client Imposed Restrictions

MFS offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent MFS from properly servicing the client account, or if the restrictions would require MFS to deviate from its standard suite of services, MFS reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program wherein the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. MFS does not participate in any wrap fee programs..

E. Assets Under Management

MFS has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$116,310,881	$821,110	December 2025

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Total Assets Under Management	Annual Fees
All Assets	2.00%

Fees are paid in advance. Moffatt Financial Strategies calculates fees based on the account value on the last business day of the prior billing cycle. Moffatt Financial Strategies uses a prorated feed based on the date funds are initially received and the aggregate amount of assets under management for the household. Lower fees for comparable services may be available from other sources.

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of MFS's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice.

Pension Consulting Services Fees

Asset-Based Fees for Pension Consulting

Total Assets Under Management	Annual Fee
All Assets	2.00%

The advisory fee is calculated using the value of the assets on the last business day of the prior billing period

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of MFS's fees within five business days of signing the Pension Consulting Agreement. Thereafter, clients may terminate the pension consulting agreement generally with 30 days' written notice.

Financial Planning Fees

Fixed Fees

The negotiated fixed rate for creating client financial plans is between $1,000 and $25,000.

Hourly Fees

The negotiated hourly fee for these services is between $100 and $400.

Clients may terminate the agreement without penalty, for full refund of MFS's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

Selection of Other Advisers Fees

MFS may direct clients to third-party investment advisers. MFS will receive its standard fee on top of the fee paid to the third-party adviser. The fees shared are negotiable and will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

MFS may specifically direct clients to LPL Financial LLC (CRD# 6413). The annual fee schedule is as follows:

Total Assets	MFS's Fee	LPL's Fee	Total Fee
$10,000 - $99,999	1.00%	0.35%	1.35%
$100,000 - $499,999	1.00%	0.25%	1.25%
$500,000 - $749,999	1.00%	0.23%	1.23%
$750,000 - $999,999	1.00%	0.18%	1.18%
$1,000,000 - $2,499,999	1.00%	0.16%	1.16%
$2,500,000 and up	1.00%	0.13%	1.13%

For certain models, LPL will retain a portion of the manager fee (0.05% of model assets per year) for effecting, processing, and executing transactions based on factors such as the strategic or tactical mandate of the model. If your account includes more than one model, the applicable manager fee applies to the assets invested in that model.

MFS may also utilize third-party portfolio managers through the LPL platform and their fees range from 0.00% to 0.50%.

ERISA accounts are not subject to this portion of the fee and pay a manager fee that is 0.05% lower than other accounts. The fee varies by manager, ranging from 0.000–0.600%.

MFS may specifically direct clients to TownSquare Capital LLC (CRD# 288576). The annual fee schedule is as follows:

Total Assets	MFS's Fee	Townsquare's Fee	Total Fee
$0 - $50,000,000	1.00%	0.78%	1.78%

Total Assets	MFS's Fee	Townsquare's Fee	Total Fee
$50,000,001 - $250,000,000	1.00%	0.62%	1.62%
$250,000,001 - $100,000,000	1.00%	0.46%	1.46%
$100,000,001 and up	1.00%	0.38%	1.38%

Below is the standard Fee Schedule for Townsquare Capital. The AUM tranches are based on the MFS's AUM in relation to Townsquare Capital. MFS has outsourced its billing to OCIO, which bills MFS and then pays the appropriate parties. The tranche information above is based on the client's maximum fee for the Under $50mm category.

	Under $50mm	Under $250mm	$250mm - $1B	$1B+
Custom Indexing	0.25%	0.20%	0.15%	0.125%
Equity SMA	0.25%	0.20%	0.15%	0.125%
Custom Bond Ladder	0.40%	0.35%	0.30%	0.25%
Models and BRIX	0.25%	0.20%	0.15%	0.125%
Structured Note	0.65%	0.50%	0.35%	0.25%
Outsourced Trading	0.10%	0.09%	0.08%	0.07%
Client Account Billing	0.03%	0.03%	0.03%	0.03%

Reporting Only Accounts are charged $20 per month.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in advance.

Payment of Pension Consulting Fees

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in advance.

Payment of Financial Planning Fees

Financial planning fees are paid via check, ACH and wire.

Fixed financial planning fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

Hourly financial planning fees are paid in arrears upon completion.

Payment of Selection of Other Adviser Fees

Fees for selection of LPL Financial as third-party adviser are withdrawn by the custodian directly from client accounts. MFS then receives its portion of the fees from the custodian; MFS does not directly deduct the advisory fees. Fees are paid quarterly in advance.

MFS has outsourced its billing to OCIO, which bills MFS and then pays the appropriate parties. Fees are paid quarterly in advance.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by MFS. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

MFS collects fees in advance.

When a client terminates or cancels mid-billing period, they are due a prorated refund since the full quarter was already billed in advance. This is calculated based on how many days in the cycle the account was being managed in the billing period, and the client is refunded for the number of days in cycle that are remaining in the quarter once we receive the delink notice from the custodian. Refunds are processed directly through Orion to the client's account, with the Trade Desk submitting the refund to the custodian. Firms that receive the monthly cancellation refund report do not need to take any action, as refunds are already submitted as part of this process; the report is provided for recordkeeping purposes only. Reports are generated only when refunds are due.

Cancellation refund reports are produced monthly on the 15th (or the day prior to weekend) and reflect refunds owed for the prior month in arrears. This applies to firms that bill in advance. For example, refunds processed on February 15 would reflect client terminations that occurred in January.
The process begins when Orion receives a delink notice from the custodian after an account is cancelled. The Trade Desk then confirms the termination with the firm and formally closes the account in Orion. When the billing team runs the cancellation report on the 15th, the audit captures all accounts that were terminated in Orion during the prior month, and fees are prorated through the termination date.

Firms and reps do not need to request refunds for this process to occur, though they are always welcome to proactively notify the Trade Desk if they are aware of an account that should be refunded.

Fixed fees that are collected in advance will be a prorated refunded based on the number of hours of work performed at the point of termination. The refund will be calculated by multiplying hours worked by the stated hourly rate, as noted in the client agreement. Any

unearned portion of the prepaid fee will be returned via check or direct deposit within fourteen days of termination.

Fees for the selection of third-party advisers are paid in advance.

E. Outside Compensation For the Sale of Securities to Clients

Derek Jefferson Moffatt is an insurance agent and, in this role, accepts compensation for the sale of insurance products to MFS clients.

1. This is a Conflict of Interest

Supervised persons may accept compensation for the sale of insurance products. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of insurance products for which the supervised persons receives compensation, MFS will document the conflict of interest in the client file and inform the client of the conflict of interest.

2. Clients Have the Option to Purchase Recommended Products From Other Brokers

Clients always have the option to purchase MFS recommended products through other brokers or agents that are not affiliated with MFS.

3. Commissions are not MFS's primary source of compensation for advisory services

Commissions are not MFS's primary source of compensation for advisory services.

4. Advisory Fees in Addition to Commissions or Markups

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on insurance products recommended to clients.

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

MFS does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

MFS generally provides advisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit Sharing Plans

There is no account minimum for any of MFS's services.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

MFS's methods of analysis include Fundamental analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Investment Strategies

MFS uses long term trading, short term trading, short sales, margin transactions and options trading (including covered options, uncovered options, or spreading strategies).

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

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

Investment Strategies

MFS's use of short sales, margin transactions and options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Margin transactions use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

Options transactions involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

Short sales entail the possibility of infinite loss. An increase in the applicable securities' prices will result in a loss and, over time, the market has historically trended upward.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

MFS's use of short sales, margin transactions and options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of 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 in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments 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, 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, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially "time the market" is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and

investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

Venture capital funds invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a "naked" or uncovered put is not unlimited, whereas the potential loss

for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither MFS nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither MFS nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Derek Jefferson Moffatt is a licensed insurance agent with Advisor's Resource Company. This activity creates a conflict of interest since there is an incentive to recommend insurance products based on commissions or other benefits received from the insurance company, rather than on the client's needs. Additionally, the offer and sale of insurance products by supervised persons of MFS are not made in their capacity as a fiduciary, and products are limited to only those offered by certain insurance providers. MFS addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. MFS periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. MFS will disclose in advance how it or its supervised persons are compensated and will disclose conflicts of interest involving any advice or service provided. At no time will there be tying between business practices and/or services (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service). No client is ever under any obligation to purchase any insurance product. Insurance products recommended by MFS's supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended through other unaffiliated insurance agencies.

Derek Jefferson Moffatt is an investment adviser representative with another investment advisory firm, Strategic Financial Concepts, LLC. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. MFS always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any MFS representative in such individual's outside capacities.

Derek Jefferson Moffatt owns 711 Consulting, which provides exit and succession planning for business owners. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. MFS always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any MFS representative in such individual's outside capacities.

Derek Jefferson Moffatt has conducted business under the name "Moffatt Financial Strategies" since 2011. Previously affiliated with Moffatt Financial Strategies, LLC, he now operates through Moffatt Wealth Management, LLC, continuing to use the same business name of "Moffatt Financial Strategies".

Derek Jefferson Moffatt is President of the National Drowning Prevention Alliance, a nonprofit organization dedicated to reducing the incidence of drowning and preventing tragedy around water. While this role is not investment-related and does not present

known conflicts of interest, Moffatt Financial Strategies always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any Moffatt Financial Strategies representative in such individual's outside capacities.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

MFS may direct clients to third-party investment advisers. MFS will be compensated via a fee share from the advisers to which it directs those clients. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that MFS has an incentive to direct clients to the third-party investment advisers that provide MFS with a larger fee split. MFS will always act in the best interests of the client, including when determining which third party investment adviser to recommend to clients. MFS will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where MFS is recommending the adviser to clients.

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

A. Code of Ethics

MFS has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. MFS's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

MFS does not recommend that clients buy or sell any security in which a related person to MFS or MFS has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of MFS may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of MFS to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. MFS will always document any transactions that could be construed as conflicts of interest and will never engage in

trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of MFS may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of MFS to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, MFS will never engage in trading that operates to the client's disadvantage if representatives of MFS buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on MFS's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and MFS may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in MFS's research efforts. MFS will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

MFS will require clients to use Schwab Institutional, a division of Charles Schwab & Co., Inc., LPL Financial LLC, or Fidelity Brokerage Services LLC ("Fidelity").

1. Research and Other Soft-Dollar Benefits

While MFS has no formal soft dollars program in which soft dollars are used to pay for third party services, MFS may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). MFS may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and MFS does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. MFS benefits by not having to produce or pay for the research, products or services, and MFS will have an incentive to

recommend a broker-dealer based on receiving research or services. Clients should be aware that MFS's acceptance of soft dollar benefits may result in higher commissions charged to the client.

MFS receives support services and/or products from LPL Financial, many of which assist the MFS to better monitor and service program accounts maintained at LPL Financial; however, some of the services and products benefit Taurus and not client accounts. These support services and/or products may be received without cost, at a discount, and/or at a negotiated rate, and may include the following:

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

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

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

2. Brokerage for Client Referrals

MFS receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

MFS will require clients to use LPL Financial, Charles Schwab & Co., Inc., and Fidelity to execute transactions.

B. Aggregating (Block) Trading for Multiple Client Accounts

If MFS 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. In such case, MFS 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 policy. MFS would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for MFS's advisory services provided on an ongoing basis are reviewed at least annually by Derek Jefferson Moffatt, Managing Member and Chief Compliance Officer, with regard to clients' respective investment policies and risk tolerance levels. All accounts at MFS are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Derek Jefferson Moffatt, Managing Member and Chief Compliance Officer. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, MFS's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of MFS's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and fees. This written report will come from the custodian. MFS will also provide at least quarterly a separate written statement to the client.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

MFS does not receive any economic benefit, directly or indirectly from any third party for advice rendered to MFS's clients.

With respect to Schwab, MFS receives access to Schwab's institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least $10 million of the adviser's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For MFS client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to MFS other products and services that benefit MFS but may not benefit its clients' accounts. These benefits may include national, regional or MFS specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of MFS by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist MFS in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of MFS's fees from its clients' accounts (if applicable), and assist with back-office training and support

functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of MFS's accounts. Schwab Advisor Services also makes available to MFS other services intended to help MFS manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to MFS by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to MFS. MFS is independently owned and operated and not affiliated with Schwab.

B. Compensation to Non – Advisory Personnel for Client Referrals

MFS does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When it deducts fees directly from client accounts at a selected custodian, MFS will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

MFS provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, MFS generally manages the client's account 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/sold, what securities to buy or sell, or the price per share. Clients may, but typically do not, impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

Item 17: Voting Client Securities (Proxy Voting)

MFS 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

A. Balance Sheet

MFS neither requires nor solicits prepayment of more than $1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither MFS nor its management has any financial condition that is likely to reasonably impair MFS's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

MFS has not been the subject of a bankruptcy petition in the last ten years.