Adaptive Financial Consulting, LLC (AFCLLC)
Form CRS Customer Relationship Summary, April 2, 2021

Firm Introduction	Adaptive Financial Consulting, LLC is an investment adviser registered with the Securities and Exchange Commission offering advisory accounts and services. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. This document gives you a summary of the types of services and fees we offer. Please visit www.investor.gov/CRS for free, simple tools to research firms and for educational materials about broker-dealers, investment advisers, and investing.
What investment services and advice can you provide me?	Our firm primarily offers the following investment advisory services to retail clients: portfolio management, financial planning. As part of our standard services, we typically monitor client accounts on a regular basis. We will discuss your investment goals, design with you a strategy to achieve your investment goals, and regularly monitor your account. We will contact you at least annually to discuss your portfolio. We provide a variety of investment options ranging from mutual funds, ETFs, Bonds, Equities and other publicly traded securities. We limit the types of investments that are recommended since not every type of investment vehicle is needed to create an appropriate portfolio. We do not have account minimums. You can choose an account that allows us to buy and sell investments in your account without asking you in advance (a "**discretionary account**") or we may give you advice and you decide what investments to buy and sell (a "**non-discretionary account**"). **For additional information**, please see the Adaptive Financial ADV 2A brochure (Items 4 and 7 of Part 2A or Items 4.A. and 5 of Part 2A Appendix 1). Ask your financial professional: • **Given my financial situation, should I choose an investment advisory service? Why or why not?** • **How will you choose investments to recommend to me?** • **What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?**
What fees will I pay?	Our fees vary and are negotiable. We charge an asset-based fee or a flat dollar fee. The amount you pay will depend, for example, on the services you receive and the amount of assets in your account. The maximum annual asset-based fee you pay us should not exceed 1% of the assets we manage for you. The negotiated fixed rate for creating client financial plans is between $1,000 and $100,000. AFCLLC may require that the client pay the financial planning in advance. Pre-paid financial planning fees are refunded by check if the plan is not completed within six months, subject to re-negotiation or before termination is requested. Fees are billed quarterly in advance or arrears depending on the type of arrangement you have with your financial professional. The asset-based fee reduces the value or your account and will be deducted from your account. The more assets you have in the advisory account, including cash, the more you will pay us. We therefore have an incentive to increase the assets in your account in order to increase our fees. You pay our fee quarterly even if you do not buy or sell. The amount you pay to our firm and your financial professional generally does not vary based on the type of investments we select on your behalf. We require written authorization from you in order to deduct advisory fees from your account held by your custodian. The custodian pays from your account when we submit written notice of the amount of the fee to be deducted. If there is insufficient cash in your account, securities may be sold. You will pay a transaction fee when we buy and sell an investment for you. In addition, some investments (such as mutual funds) impose additional fees that will reduce the value of your investment over time. **You will pay fees and cost whether you make or lose money on your investments. Fees and cost will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and cost you are paying.** **For additional information,** please see Form ADV, Part 2A brochure (Items 4, 5 and 7 of Part 2A) and other applicable documents.

	Ask your financial professional: **Help me understand how these fees and costs might affect my investments. If I give you $10,000 to invest, how much will go to fees and costs, and how much will be invested for me?**
What are your legal obligations to me when acting as my investment adviser? **How else does your firm make money and what conflicts of interest do you have?**	We are held to a fiduciary standard that covers our entire investment advisory relationship with you. For example, we are required to monitor your portfolio, investment strategy, and investments on an ongoing basis. **When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they affect the recommendations, we provide you. Here are some examples to help you understand what this means.** The principal business of Adaptive Financial Consulting is that of a Registered Investment Adviser and provider of financial planning services. Some of the principals and associated persons of the firm may be licensed as insurance agents. When acting in the capacity of an insurance agent, the Adviser and associated persons may receive the usual and customary commissions or fees associated with the products you purchase. We make extra money by advising you to purchase insurance products which pay us a separate commission fee. Receiving commissions on insurance products may cause a conflict of interest. Therefore, you are free to select any insurance company you desire. Ask your financial professional: **How might your conflicts of interest affect me, and how will you address them? For additional information**, please see Form ADV, Part 2A brochure and other applicable documents.
How do your financial professionals make money?	Our financial professionals receive a percentage of the asset-based fee or flat dollar fee we bill to you or your accounts as cash compensation. This compensation may vary based on different factors such as market value of your accounts, market volatility and performance. Our financial professionals also have the ability to receive commissions from clients and therefore have an incentive to recommend products that provide them or us additional compensation over those that do not. The more assets you have in the advisory account, including cash, the more you will pay us. We therefore have an incentive to increase the assets in your account in order to increase our fees.
Do your financial professionals have legal or disciplinary history?	**No.** We do not have any legal, financial or other "disciplinary" items to report to you. We are obligated to disclose any disciplinary event that would be material to you when evaluating our Firm and its associated persons. Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals. Ask your financial professional: **As a financial professional, do you have any disciplinary history? For what type of conduct?**
Additional Information	**For additional information about our services,** please see Form ADV, Part 2A brochure and other applicable documents. If you would like additional, up-to-date information or a copy of this disclosure, please call 440-359-3468 or email us at Jeremy Thompson jthompson@adaptivefc.com Ask your financial professional: **Who is my primary contact person? Is he or she a representative of an investment-adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?**

Adaptive Financial Consulting, LLC
Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Adaptive Financial Consulting, LLC. If you have any questions about the contents of this brochure, please contact us at 440-359-3468 or by email at:jthompson@adaptivefc.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 Adaptive Financial Consulting, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Adaptive Financial Consulting, LLC's CRD number is: 288185.

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Registration does not imply a certain level of skill or training.

Version Date: 03/29/2021

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Adaptive Financial Consulting, LLC. (AFCLLC) on March 23, 2020 are described below. Material changes relate to AFCLLC's policies, practices, or conflicts of interests.

- AFCLLC revised Types of Advisory Services Offered (Item 4B) to provide more detail of Portfolio Management and Financial Planning services.

- AFCLLC revised Financial Planning fees (Item 5B).

  Updated: *Fixed financial planning fees are paid in advance, but never more than six months in advance. Pre-paid financial planning fees are refunded by check if the plan is not completed within six months, subject to re-negotiation or before termination is requested*

  Prior: *AFCLLC may require that the client pay 50% of the financial planning in advance. Pre- paid financial planning fees are refunded by check if the plan is not completed before termination is requested*

- AFCLLC revised Frequency and Nature of Periodic Reviews and Who Makes Those Reviews. (Item 13A)

  Updated: *All client accounts for AFCLLC's advisory services provided on an ongoing basis are reviewed at least Annually by Jeremy B Thompson, CEO, or the Investment Advisory Representative he designates, with regard to clients' respective investment policies and risk tolerance levels. All accounts at AFCLLC are assigned to this reviewer.*
  All financial planning accounts are reviewed upon financial plan creation and plan delivery by Jeremy B Thompson, CEO or the Investment Advisory Representative (IAR) he designates. 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.

  Prior: *All client accounts for AFCLLC's advisory services provided on an ongoing basis are reviewed at least Annually by Jeremy B Thompson, CEO, with regard to clients' respective investment policies and risk tolerance levels. All accounts at AFCLLC are assigned to this reviewer.*
  All financial planning accounts are reviewed upon financial plan creation and plan delivery by Jeremy B Thompson, CEO. 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.

- AFLLC revised Content and Frequency of Regular Reports Provided to. (Item 13C)

  Updated: *AFCLLC will typically also provide a separate written statement to the client at the annual review.*

  Prior: *AFCLLC will also provide at least quarterly a separate written statement to the client.*

Item 3: Table of Contents

Item 4: Advisory Business

A. Description of the Advisory Firm

Adaptive Financial Consulting, LLC (hereinafter "AFCLLC") is a Limited Liability Company organized in the State of Ohio. The firm was formed in May 2013 and formerly used as a DBA for other business of a registered investment adviser under another firm. The firm began providing investment advisory services after registering as an investment adviser in 2017. Jeremy Bigelow Thompson is the principal owner.

B. Types of Advisory Services

Portfolio Management Services

AFCLLC offers a variety of investment advisory services to our clients with discretionary and non-discretionary authority. AFCLLC's services include investment management, financial planning, and consulting services. Prior to providing advisory services, clients are required to enter into a written agreement with AFCLLC.

Investment Management Services

We work with our clients to identify their investment goals and objectives as well as risk tolerance to create an initial portfolio allocation designed to complement their clients' financial goals and objectives. We may create a portfolio, consisting of, but not limited to no-load funds and/or load-waived funds, exchange traded funds, individual stocks, or bonds.

Each portfolio will be initially designed to meet a particular investment goal which AFCLLC has determined to be suitable to our client's circumstances. Once the appropriate portfolio has been determined, we will review the portfolio and rebalance the account based upon our client's individual needs, stated goals and objectives. AFCLLC's strategy, generally, will be to seek to meet client investment objectives while providing clients with access to personal advisory services. AFCLLC may also provide advice about any type of legacy position or other investment held in client portfolios.

As a fiduciary, AFCLLC always acts solely in your best interests. Your portfolio is customized based on your investment objectives. You may make requests or make suggestions in writing regarding the investments made in your portfolio. Restrictions on trading which, in our opinion, are not in your best interest cannot be honored and if forced may result in the termination of our agreement.

In cases where we are not given discretion, we must receive permission from the client to make any trades on a nondiscretionary basis. In non-discretionary accounts, you have the right to decide whether to act upon AFCLLC's recommendations. If you elect to act on any of the recommendations, you have the right to effect the transaction through a professional unaffiliated with AFCLLC.

Financial Planning Services

AFCLLC offers a broad range of financial planning and consulting services for our clients. Planning services can be provided on a stand-alone basis, or in conjunction with our investment management services. Financial Planning services are generally complimentary for clients that have investment management services. The exception would be if financial planning is requested for complex situations beyond our normal scope listed below.

The services take into account information collected from the client such as financial status, investment objectives, tax status, and financial resources among other data. With respect to estate planning and tax planning, our role will be that of a coordinator between you and your designated professional(s).

Financial Planning includes, in all or part, but is not limited to, the preparation of a financial plan for an investment advisory client which may include reviews and recommendations on any or all of the following areas depending on the client's circumstances:

- **Investment Planning**: Determine with the client, based on their goals, time horizon and risk tolerance, how to structure a suitable portfolio (using mutual funds and ETF's) using principles of diversification, asset allocation, and sometimes asset location.

- **Investment Policy Statements**: Determining specific parameters within which a client's investments will be managed that can include the weighting of stocks to bonds to cash, the limitation on the use of any particular type of security, the methodology used for rebalancing and so on.
- **Portfolio review and evaluation**: Assessment of a client's existing portfolio to determine suitability of their current investments and in some cases, evaluating the differences between such and the methods AFCLLC utilizes to manage assets. Evaluation can include weighting of asset classes, types of securities used, concentrated positions, tax efficiency of investments, expense ratios and so forth.
- **Capital Needs Analysis (Goal Funding)**: A method using time value of money calculations to determine how much a client would need to save, at a given level of return, every month or year in order to achieve a certain financial goal, such as paying for 4 years of college for their child.
- **Tax Management and Planning**: Forward-looking tax strategy that can help a client minimize their tax expenses and maximize what they have to invest. This can include planning for Roth Conversions, Strategic Charitable giving, Deferring income into tax advantaged retirement accounts, tax-loss harvesting – to name a few.

- **Trust and Estate Planning**: Helping a client understand how assets are distributed upon death and at times, working with their estate planning attorneys to achieve both their financial and estate planning goals. This also involves review of beneficiary designations and ensuring clients have the proper and updated documents drafted to ensure they are always in control of how assets will be distributed.
- **Retirement Planning**: Gathering data that relates to a client's assets, liabilities, expenses, goals and savings, and evaluating such to determine the most appropriate strategy to achieving the greatest probability of being able to retire in the lifestyle they desire and maintain such for the rest of their lives.
- **Social Security**: Helping a client decide when to file for social security is a critical part of the retirement planning process. Married clients are advised on how to make their selections based on their particular circumstances as a couple and can involve a complex analysis that depends on longevity, income needs, and whether the client/s intend to work in their retirement.
- **Employee Benefits**: If a client is an employee and has access to benefits, an analysis of available benefits can be done together with the client, offering advice on what benefits should be selected based upon the particular client's wishes, goals and family needs. This can include various types of insurance, Flexible Spending accounts, Employee Stock Purchase plans, Restricted Stock Awards, Options, and so on.
- **Education Planning**: Helping clients plan financially for the expenses involved in educating their children and the function of various tax advantaged ways of saving for such expenses such as with a 529 plan and annual gifting.
- **Budgeting and Cash Flow Planning**: Determining with the client what their net income and monthly/annual expenses are to determine where costs might be reduced to produce additional cash flow that can be allocated towards goals.
- **Debt Management**: Where a client has debts, gathering data on the nature and interest rates being paid on all liabilities, then completing a cash flow analysis to come up with the best strategy for down of debt in the most efficient way possible.
- **Business Planning**: If a client has or wishes to set up a small business, advice can be provided on entity selection, setting up of a retirement plan, employee benefits, and potentially a cross-purchase/buy-sell agreement.
- **Charitable Giving**: When a client wishes to be philanthropic, AFCLLC can assist the client in how to leverage their investments to maximize contributions and provide tax advantages simultaneously. This can include gifting of required minimum distributions (RMD's), setting up of Donor Advised Funds or gifting of highly appreciated shares, to name a few.
- **Insurance Analysis**: Gathering data on all current insurance policies that a client may have such as life, disability, and long term care policies and running an analysis to ensure that there is an adequate transfer of financial

risk to the insurance company and a client still has the opportunity to meet their financial goals should something unforeseen occur such as a premature death or an disability.

- **Risk Management** (Life and Disability Insurance): AFCLLC can offer advice on what types of insurance a client may need or be lacking and how much would be adequate to ensure their goals are still met in the event of a disability or premature death.
- **Disability Planning and Income Protection**: Using various planning tools, an analysis of any current income protection a client may have through work (or owned individually) is completed to determine whether there any "gaps" that might leave the client's family unable to meet financial goals and if so, providing advice with finding the appropriate coverage.

Financial planning services can vary and is customized depending on each client's complexity and circumstances. The financial planning services will be defined and agreed upon by both parties in advance. For example, a client's not using AFCLLC's investment management services may request a comprehensive financial plan, or certain components of our planning services. The amount of time it could take to provide each of the financial planning services will depend on the client's unique circumstances and will vary from client to client. Our services are customized based on what a client may request. In addition, the amount of time it takes to provide these services is dependent on the quality and scope of the information that is provided by the client to the advisor.

Clients are encouraged to review their plans on a regular basis.

AFCLLC has a conflict of interest because it offers both financial planning and investment management services. When providing financial planning services, AFCLLC has an incentive to recommend itself for investment management services as AFCLLC receives additional compensation. AFCLLC mitigates this conflict of interest by disclosing this conflict to you and disclosing that clients always have the right to decide whether to act on any of the recommendations made by AFCLLC and if you elect to act on any of the recommendations, you have the right to effect the transactions through a professional unaffiliated with AFCLLC. Our fiduciary obligation is to always act and recommend in the clients' best interest.

Consulting Services

AFCLLC provides a wide array of customized consulting services which may vary greatly in depth and scope and may be offered in a variety of different situations or circumstances that relate to your financial picture. We may consult with you regarding topics that are not covered under our general financial planning services or may not rise to the level of financial planning in the extent of data-gathering and Financial planning services can vary and is customized depending on each client's complexity and circumstances. The financial planning services will be defined and agreed upon by both parties in advance. For example, a client's not using AFCLLC's investment management services may request a comprehensive financial plan, or certain components of our planning services.

The amount of time it could take to provide each of the financial planning services will depend on the client's unique circumstances and will vary from client to client. Our services are customized based on what a client may request. In addition, the amount of time it takes to provide these services is dependent on the quality and scope of the information that is provided by the client to the advisor.

Clients are encouraged to review their plans on a regular basis.

AFCLLC has a conflict of interest because it offers both financial planning and breadth and depth of recommendations. We may consult on such items as a real estate purchase, a sale analysis or review of a financial account. Financial accounts may be accounts that are held at other firms or qualified retirement accounts held through the Client's employer. The scope and cost of our consulting services are defined in writing prior to the engagement and will depend on the complexity of the situation. Consulting services will be offered to any client who the advisor deems to have circumstances that could be aided by our consulting services. Some factors in this determination may be the advisor's experience and level of expertise with the situation. Clients always have the right to decide whether to engage AFCLLC for consulting services

Pension Consulting Services

AFCLLC 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.

Services Limited to Specific Types of Investments

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

Educational Seminars

AFCLLC will provide educational seminars based around basic and advanced financial and tax mitigation planning for small business owners. AFCLLC will educate people on various entity structures and the tax implications and how it impacts their current personal financial situation, to various qualified and non-qualified plan designs. AFCLLC will educate people on the difference between an asset vs. stock sale and the type of business entity that they are and how it impacts their overall planning when it comes time to sell their business. We also cover what to do with the money after they have sold their business.

C. Client Tailored Services and Client Imposed Restrictions

AFCLLC offers the same suite of services to all 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 AFCLLC from properly servicing the client account, or if the restrictions would require AFCLLC to deviate from its standard suite of services, AFCLLC reserves the right to end the relationship.

D. 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. AFCLLC does not participate in any wrap fee programs.

E. Assets Under Management

AFCLLC has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$214,247.440.00	$70,901,977.00	December 2020

AFCLLC has $285,149,417.00 in assets under management as of December 2020.

Item 5: Fees and Compensation

A. Fee Schedule

Lower fees for comparable services may be available from other sources.

Portfolio Management Fees

Total Assets Under Management	Annual Fees
$0 - $2,000,000	1.00%
$2,000,001 - $3,500,000	0.90%
$3,500,001 - $$5,000,000	0.80%
$5,000,001 - $10,000,000	0.70%
$10,000,001 - $20,000,000	0.60%
$20,000,001 –And Up	0.50%

Fees are paid in advance. The advisory fee is calculated using the value of the assets in the Account on the last business day of the prior billing period. Upon termination, for any unearned asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365. This a tiered fee schedule.

AFCLLC is authorized to withdraw management fees directly from the Account on a quarterly basis. Because client fees will be withdrawn directly from client accounts, in states that require it, AFCLLC will:

(A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
(B) Send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client.
(C) Send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

These fees are generally negotiable, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of AFCLLC'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

Total Assets Under Management	Annual Fees
$0 - $2,000,000	1.00%
$2,000,001 - $3,500,000	0.90%
$3,500,001 - $$5,000,000	0.80%
$5,000,001 - $10,000,000	0.70%
$10,000,001 - $20,000,000	0.60%
$20,000,001 –And Up	0.50%

Fees are paid in advance. The advisory fee is calculated using the value of the assets in the Account on the last business day of the prior billing period. Upon termination, for any unearned asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365). This a tiered fee schedule.

AFCLLC is authorized to withdraw management fees directly from the Account on a quarterly basis. Because client fees will be withdrawn directly from client accounts, in states that require it, AFCLLC will:

(A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
(B) Send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client.
(C) Send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Clients may terminate the agreement without penalty for a full refund of AFCLLC's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the pension consulting agreement generally with 30 days' written notice. AFCLLC bills based on the balance on the first day of the billing period

Financial Planning Fees

Fixed Fees

The negotiated fixed rate for creating client financial plans is between $1,000 and $100,000. AFCLLC may require that the client pay the financial planning in advance. Pre- paid financial planning fees are refunded by check if the plan is not completed before termination is requested.

The fees are negotiable, and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. AFCLLC and the client will ultimately determine the negotiated fixed fee depending on the specific financial planning services (listed above) that the client requires, the need to take into account dependents or other individuals, the diversity of client assets to be addressed by the financial plan, as well as conversations with the client. Fixed fees will be offered to all clients.

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

Educational Seminars Fee

AFCLLC will not charge for the educational seminars they offer.

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 or via electronic payment options.

Fixed financial planning fees are paid in advance, but never more than six months in advance. Pre-paid financial planning fees are refunded by check if the plan is not completed within six months, subject to re-negotiation or before termination is requested

Payment of Educational Seminars

AFCLLC will not charge for the educational seminars they offer.

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 AFCLLC. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

AFCLLC collects fees in advance. Refunds for fees paid in advance will be returned within fourteen days to the client via check or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

E. Outside Compensation for the Sale of Securities to Clients

Neither AFCLLC nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

AFCLLC 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

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

- Individuals
- High-Net-Worth Individuals
- Pension and Profit-Sharing Plans
- Corporations or Business Entities

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

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

AFCLLC's methods of analysis include Charting analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis, and Technical analysis.

Charting analysis involves the use of patterns in performance charts. AFCLLC uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

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

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Technical analysis involves the analysis of past market data, primarily price and volume.

Investment Strategies

AFCLLC uses long term trading, short term trading, 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

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be assuming that past performance will be indicative of future performance. This may not be the case.

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.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Investment Strategies

AFCLLC's use of 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.

Selection of Other Advisers: AFCLLC's selection process cannot ensure that money managers will perform as desired and AFCLLC will have no control over the day-to-day operations of any of its selected money managers. AFCLLC would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

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

AFCLLC's use of 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. 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.

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.

Hedge funds often engage in leveraging and other speculative investment practices that may increase the risk of loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; May involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

Private equity funds carry certain risks. Capital calls will be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

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.

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 AFCLLC 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 AFCLLC 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

Jeremy Bigelow Thompson is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. AFCLLC always acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of AFCLLC in connection with such individual's activities outside of AFCLLC.

Tobias Ryan Yearms is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. AFCLLC always acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of AFCLLC in connection with such individual's activities outside of AFCLLC.

Luke Timothy Parton is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. AFCLLC always acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of AFCLLC in connection with such individual's activities outside of AFCLLC.

Rachelle Renee Kovacs owns 50% of a single-family residential rental in Brooklyn OH. She receives no commission and all rental income goes to paying expensed for this activity.

Rachelle Renee Kovacs owns 50% of land contract for property in Hancock County, WV. She inherited the property and receives no commission. She receives $500/month from land contract payments.

All material conflicts of interest under Section 260.238 (k) of the California Corporations Code are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Michael Christopher Krueger is a Territory Manager at Smart Choice Insurance. 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. Adaptive Financial Consulting, LLC 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 representative of Adaptive Financial Consulting, LLC in such individual's outside capacities.

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

AFCLLC does not direct clients to third-party investment advisers.

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

A. Code of Ethics

AFCLLC 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. AFCLLC's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of AFCLLC may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of AFCLLC 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. AFCLLC 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 AFCLLC may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of AFCLLC 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, AFCLLC will never engage in trading that operates to the client's disadvantage if representatives of AFCLLC 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 AFCLLC'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 AFCLLC 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 AFCLLC's research efforts. AFCLLC will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

AFCLLC recommends Fidelity Brokerage Services LLC.

1. *Research and Other Soft-Dollar Benefits*

While AFCLLC has no formal soft dollars program in which soft dollars are used to pay for third party services, AFCLLC may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). AFCLLC 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 AFCLLC does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. AFCLLC benefits by not having to produce or pay for the research, products or services, and AFCLLC will have an incentive to recommend a broker-dealer based on receiving research or services.

Clients should be aware that AFCLLC's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. *Brokerage for Client Referrals*

AFCLLC 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*

AFCLLC may permit clients to direct it to execute transactions through a specified broker-dealer. If a client directs brokerage, then the client will be required to acknowledge in writing that the client's direction with respect to the use of brokers supersedes any authority granted to AFCLLC to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; the client may be unable to participate in block trades (unless AFCLLC is able to engage in "step outs"); and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

If AFCLLC 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, AFCLLC 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. AFCLLC 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).

Item 13: Review of Accounts

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

All client accounts for AFCLLC's advisory services provided on an ongoing basis are reviewed at least Annually by Jeremy B Thompson, CEO, or the Investment Advisory Representative he designates, with regard to clients' respective investment policies and risk tolerance levels. All accounts at AFCLLC are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Jeremy B Thompson, CEO or the Investment Advisory Representative (IAR) he designates. 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, AFCLLC's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

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

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)

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

B. Compensation to Non – Advisory Personnel for Client Referrals

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

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, AFCLLC 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. Fidelity will issue a written report to the client on a quarterly basis.

Custody is also disclosed in Form ADV because AFCLLC has authority to transfer money from client account(s), which constitutes a standing letter of authorization (SLOA). Accordingly, AFCLLC will follow the safeguards specified by the SEC rather than undergo an annual audit.

Item 16: Investment Discretion

AFCLLC provides 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, AFCLLC 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)

AFCLLC 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

AFCLLC 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 AFCLLC nor its management has any financial condition that is likely to reasonably impair AFCLLC's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

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