

**Item 1: Cover Page**

- A. AdaptFirst Investments | 4226 Starmount Drive, Greensboro, NC 27410 | [charles@adaptfirst.com](mailto:charles@adaptfirst.com) | [www.adaptfirst.com](http://www.adaptfirst.com)
- B. This brochure provides information about the qualifications and business practices of AdaptFirst Investments LLC. If you have any questions about the contents of this brochure, please contact us at (336) 937-0025 or by email at: [charles@adaptfirst.com](mailto:charles@adaptfirst.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 AdaptFirst Investments LLC is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). AdaptFirst Investments LLC’s CRD number is: 289096.
- C. This registration does not imply a certain level of skill and training.

**Version Date: 9/6/2023**
**Item 2: Material Changes**

AdaptFirst Investments LLC has the following material changes to report. Material changes relate to AdaptFirst Investments LLC’s policies, practices or conflicts of interests:

- Item 9 – Disclosure information for Tristen Gadberry regarding registration oversight.
- Item 10C – Removal of James Sutton and Ryan Stark as AFI Advisors.
- Item 12A – Change of Custodian from TD Ameritrade to Charles Schwab.
- Item 15 – Change of Custodian from TD Ameritrade to Charles Schwab.

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#### Item 4: Advisory Business

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**A. Description of the Advisory Firm**

AdaptFirst Investments LLC (hereinafter "AFI") is a Limited Liability Company organized in the State of North Carolina. The firm was formed in May 2017, and the principal owner is Charles Franklin Freeman Jr.

**B. Types of Advisory Services**

**Ongoing Portfolio Management Services** - AFI offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. AFI creates an Investor Profile for each client, which outlines the client's current situation and risk profile. Portfolio management services include, but are not limited to, the following: investment research and strategy, securities recommendations and trading, asset allocation, risk management, portfolio monitoring, and financial planning.

AFI evaluates the current investments of each client with respect to their risk tolerance levels and investment goals. AFI may enter into an agreement with the firm under a discretionary or non-discretionary basis. AFI will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. AFI seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of AFI's economic, investment or other financial interests. To meet its fiduciary obligations, AFI attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, AFI'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 AFI's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

**Consulting by the Hour** - Project consulting by the hour may include but not limited to investment analysis; financial planning; stock valuation; 401k asset allocation; life insurance planning; tax concerns; retirement planning; college planning; and debt/credit planning. AFI may conduct a seminar with respect to these topics and may or may not charge a fee for attendance.

The AFI investment adviser, or an affiliate or associated person of the investment adviser, will receive commissions from the sale of insurance or real estate or will receive fees or other compensation from the sale of securities or other products or services recommended in the financial plan or otherwise has a conflict of interest if the client decides to use AFI as an investment advisor for the recommendations. **The client is under no obligation to act on the investment adviser's or associated person's recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser or the associated person when such person is employed as an agent with a licensed broker-dealer or is licensed as a broker-dealer or through any associate or affiliate of such person.**

**CIO Consulting Services** – AFI offers outsourced CIO (Chief Investment Officer) services to other financial advisors on a flat fee basis. Scope of work could include, but is not limited to, investment model creation and/or monitoring, investment research, written commentary, and allocation recommendations. Custom services consist of a customized solution determined after consultation with the financial advisor based on their unique needs.

**Financial Coaching/Budget Boot Camp – (offered by Leslie Garner, CFP)**

The boot camp helps clients understand spending habits to create a customized budget. Leslie teaches clients how to make smart choices with their money and start saving more. The boot camp will also show clients how to keep their credit score healthy, which will give them more financial options in the future. Clients discover how to overcome financial obstacles and build wealth over time. Lastly, the boot camp will help clients establish and stick to their financial goals, so they can continue to improve their financial situation and become a benefactor for their household and community.

When a client has not received a copy of the brochure document at least 48 hours prior to signing an agreement, the client has five business days in which to cancel the agreement, without penalty.

**C. Client Tailored Services and Client Imposed Restrictions**

AFI offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investor Profile which outlines each client's current situation (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 AFI from properly servicing the client account, or if the restrictions would require AFI to deviate from its standard suite of services, AFI 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. AFI does not participate in any wrap fee programs.

**E. Assets Under Management**

AFI has the following assets under management directly with custodians:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 45,646,714	\$535,239	12/31/2022

**Item 5: Fees and Compensation**

**A. Default Fee Schedule**

**Portfolio Management Fees**

Total Assets Under Management	Annual Fees
\$0 - \$500,000	1.25%
\$500,001 - \$2,000,000	1.00%
\$2,000,000 - AND UP	0.75%

For clients at Charles Schwab/Schwab, AFI uses an average balance in the client's account throughout the billing period after considering deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based. For additional custodians, any applicable fee schedule will be disclosed on the Investment Advisory Agreement and the calculation will be disclosed in the Notes section of that contract. These fees are generally negotiable, and the final fee schedule is attached to the Investment Advisory Agreement. Lower fees for comparable services may be available from other sources. Clients may terminate the agreement without penalty for a full refund of AFI's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract upon 30 days written notice.

**Consulting Fees** - The hourly fee for these services is \$150. These fees are generally negotiable, and the final fee schedule is detailed in the Hourly Consulting Agreement. Clients may terminate the agreement without penalty, for full refund of AFI's fees, within five business days of signing the Hourly Consulting Agreement. Thereafter, clients may terminate the Hourly Consulting Agreement generally upon written notice.

**CIO Subscription Services Fees** – The typical fee is \$700/month for the Custom Service. These fees are generally negotiable, and the final fee schedule is detailed in the CIO Services Agreement. The final fee will be determined after consultation with the advisor and a mutual agreement regarding the Scope of Work required for that advisor.

**Financial Coaching/Budget Boot Camp Fees** – The annual fee for this service is \$810 for individuals and \$1110 for couples billed monthly in arrears.

## 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 or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

**Payment of Consulting Fees** - Project consulting fees are paid via check or credit card on an interim basis for ongoing engagements or in arrears upon completion for one-time projects. Seminar fees will be charged in advance of event via credit card or check.

**Payment of CIO Subscription Services Fees** – Newsletter subscription fees may be paid monthly via check or credit card in arrears.

**Financial Coaching/Budget Boot Camp Fees** – Boot Camp fees may be paid monthly via check or credit card in arrears.

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

## D. Prepayment of Fees

If AFI collects fees in advance, clients can get a pro-rata or full refund in the event AFI is not able to deliver the full service to the client in the specified time for some reason. The amount of refund will be calculated in consideration of how much (if any) of the service has been completed.

## E. Outside Compensation for the Sale of Securities to Clients

Some AFI Advisors are registered representatives of a broker-dealer and/or an insurance agent and in these roles, accepts compensation for the sale of investment products to AFI clients.

### 1. Conflict of Interest

Supervised persons may accept compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds to AFI's clients. This presents a conflict of interest and could give 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 investment products for which the supervised persons receives compensation, AFI 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 AFI recommended products through other brokers or agents that are not affiliated with AFI.

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

AFI does not charge clients performance-based fees or do side-by-side management.

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## Item 7: Types of Clients and Account Minimums

AFI generally provides advisory services to individuals or Businesses with no specific account minimum.

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## Item 8: Methods of Analysis, Investment Strategies, & Risks of Loss

### A. Methods of Analysis and Investment Strategies

**Methods of Analysis** - AFI's methods of analysis include technical analysis and Fundamental analysis on global markets and individual securities. **Technical analysis** involves the use of patterns in performance charts. AFI uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security. 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 consider new patterns that emerge over time. **Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. 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** - Specific investments and allocations typically have a medium-term target (1-3 years) but can be adjusted as ongoing research dictates. AFI utilizes a proactive investment philosophy with a focus on valuation and value relative to risk.

### B. Risks of Specific Models and Investments

Most AFI's investment theses have a **medium-term target** and can expose clients to various types of risk that will typically surface at shorter intervals during the time the client owns the investments. These risks include but are not limited to:

**Inflation Risk** – The risk that inflation will undermine an investment's returns through a decline in purchasing power. Bond payments are most at risk as their payments are generally fixed.

**Interest Rate Risk** - The potential for investment losses that result from a change in interest rates. Interest rate risk can be reduced by holding bonds of different durations or through hedging strategies.

**Company Risk** – This is the financial uncertainty for investors when they hold stock in a specific company. Company risk is any risk that could affect the profitability or solvency of a company.

**Sector Risk** – The danger that the stocks of many companies in one sector (like technology or healthcare) will fall in price at the same time because an event can affect the entire industry. An example may be a change in government regulations that affects the industry as a whole.

**Economic Risk** – This risk involves macroeconomic changes that may result in significant loss for a business. Examples include changes in exchange rates, inflation, or political instability.

**Market Risk** – The possibility of an investor experiencing losses due to factors that affect the overall performance of the financial markets he or she is involved in. Such systematic risk cannot be eliminated through diversification, but can be hedged. Examples could be a recession or terrorist attack.

**Political/Regulatory Risk** - The risk that investments could be adversely affected due to changes in government policies or leadership. Examples may include war declaration, sovereign debt defaults, and changes in leader ideology.

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

### C. Risks of Specific Securities Utilized

AFI's use of individual stocks, inverse or leveraged ETFs generally holds greater risk of capital loss due to higher volatility or product structure. 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. In general, fixed income securities carry interest rate risk, inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. 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. Areas of concern include liquidity in products and underlying holdings, increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

**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 product, issued by life insurance companies, for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or death benefit. Adding such benefits typically increases the fees associated with an annuity. 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. Withdrawing your money early from an annuity could incur penalties as well as taxes. Variable annuities also involve investment risks, just as mutual funds and ETFs do.

**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.

**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

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#### 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. Regulatory Organization Proceedings –

Michael Smith – February 2011 – NC Department of Insurance and NC State Board of Certified Public Accountant Examiners found Michael Smith was not lawfully authorized to use title of "CPA" or "Certified Public Accountant" in the state of NC. Michael was fined \$250.

Tristen Andrew Gadberry – February 2023 – The Office of Financial Regulation of Florida found Gadberry in violation of Section 517.12(4) Florida Statutes by rendering investment advice, from a location within Florida, without being registered by the Office. Gadberry agreed to Cease and Desist from violations of Chapter 517, Florida Statutes, and the Administrative Rules adopted thereto, and to pay an administrative fine in the amount of \$9,375. The Office agreed to approve Gadberry's application as an associated person (RA) with AdaptFirst Investments LLC effective February 24, 2023. The violation occurred due to an administrative oversight with Gadberry's temporary registration and miscommunication to Gadberry by AdaptFirst Investments LLC whose registration with the state of Florida was pending at the time. The firm paid the fine in association with the decision.

## Item 10: Other Financial Industry Activities and Affiliations

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### A. Registration as a Broker-Dealer Representative –

As a registered representative of Purshe Kaplan Sterling Investments, Gregory Schlaudecker may accept compensation for the sale of securities. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. AdaptFirst Investments LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of AdaptFirst Investments LLC in such individual's outside capacity.

### B. Registration regarding foregoing entities –

No AFI representative is registered as a futures commission broker, commodity pool operator, nor commodity trading advisor.

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

Charles Franklin Freeman Jr, Gregory Schlaudecker, James Eddington, Michael Smith, Ryan Gehsmann, James Byers, Leslie Garner, Tristen Gadberry, Gabriel Neeriemer, Bobby Wright, and George Kitchen are licensed insurance agents. From time to time, they will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. AdaptFirst Investments LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of AdaptFirst Investments LLC in their capacity as a licensed insurance agent.

Clients should also be aware that AFI Advisors engage in Other Outside Business Activities that involve a possible conflict of interest, and can conflict with the fiduciary duties of a registered investment adviser. AdaptFirst Investments LLC always acts in the best interest of the client. **Clients are in no way required to use an outside business activity of any representative of AdaptFirst Investments LLC.**

#### OTHER OUTSIDE BUSINESS ACTIVITIES:

See attached ADV-Part 2B for full details of each investment advisor representative's other outside business activities.

### D. Selection of Other Advisors or Manager and How This Adviser is Compensated for Those Selections –

AFI typically manages all client accounts internally based on proprietary research and investment decisions. AFI advisors do have the option to use a third-party money manager through our custodians managed money platform. The selection of the money manager process could include, but is not limited, the following criteria: investment strategy, manager tenure, nominal and risk-adjusted returns, Sharpe ratio, Information ratio, standard deviation, yield, duration, fees, turnover, and more.

AFI advisors do not receive any compensation for selecting a specific money manager.

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

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AFI will disclose to the client in writing before entering or renewing an advisory agreement with that client any material conflicts of interest 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 does not promote "fair, equitable or ethical principles".

### A. Code of Ethics –

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

### B. Recommendations Involving Material Financial Interests –

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

### C. Investing Personal Money in the Same Securities as Clients –

From time to time, representatives of AFI may buy or sell securities recommended to clients for themselves. This may provide an opportunity for representatives of AFI 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. AFI 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. To address such conflicts of interest, AFI's policy includes such controls as required pre-clearance of personal trades, and quarterly reporting of securities transactions by employees. Employees are permitted to trade the same securities on the same day as clients only when the employees participate in an aggregated or "block" trade with clients and receive the same average price. In any situation where a transaction is partially filled, no employee will receive an allocation from the block transaction until all clients have fully participated to their desired allocation.

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

From time to time, representatives of AFI may buy or sell securities recommended to clients at or around the same time as clients. This may provide an opportunity for representatives of AFI 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. AFI 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. To address such conflicts of interest, AFI's policy includes such controls as required pre-clearance of personal trades, and quarterly reporting of securities transactions by employees. Employees are permitted to trade the same securities on the same day as clients only when the employees participate in an aggregated or "block" trade with clients and receive the same average price. In any situation where a transaction is partially filled, no employee will receive an allocation from the block transaction until all clients have fully participated to their desired allocation.

## Item 12: Brokerage Practices

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

Custodians/broker-dealers will be recommended based on AFI'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 AFI 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 AFI's research efforts. AFI will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

### **1. Research and Other Soft-Dollar Benefits**

AFI receives research, product, or services in addition to execution from broker-dealers or custodians in connection with client securities transactions ("soft dollar benefits").

- a. When AFI uses client brokerage commissions (or markups or markdowns) to obtain research or other products or services, AFI receives a benefit because AFI does not have to produce or pay for the research, products, or services.
- b. AFI may have an incentive to select or recommend a broker-dealer based on our interest in receiving the research or other products or services, rather than on the clients' interest in receiving most favorable execution.

### **2. Brokerage for Client Referrals**

AFI 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**

AFI will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

AFI currently uses Charles Schwab as its primary custodian. AFI participates in the institutional advisor program (the "Program") offered by Charles Schwab. Charles Schwab offers independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. There is no direct link between AFI's participation in the Program and the investment advice it gives to its clients, although AFI receives economic benefits through its participation in the Program that are typically not available to Charles Schwab retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving AFI participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have AFI's fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to AFI by third party vendors. Charles Schwab may also pay for business consulting and professional services received by AFI's related persons. Some of the products and services made available by Charles Schwab through the Program may benefit AFI but may not benefit its client accounts. These products or services may assist AFI in managing and administering client accounts, including accounts not maintained at Charles Schwab. Other services made available by Charles Schwab are intended to help AFI manage and further develop its business enterprise. The benefits received by AFI or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to Charles Schwab. As part of its fiduciary duties to clients, AFI endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by AFI or its related persons in and of itself creates a conflict of interest and may indirectly influence the AFI's choice of Charles Schwab for custody and brokerage services.

### **B. Aggregating (Block) Trading for Multiple Client Accounts –**

If AFI 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, AFI 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. AFI 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**

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### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews –**

All client accounts for AFI's advisory services provided on an ongoing basis are reviewed at least Quarterly by the assigned account advisor, with regard to clients' respective investment policies and risk tolerance levels. All consulting accounts are reviewed upon project creation and report delivery by the applicable advisor. Project consulting clients are provided a one-time written report concerning the project details. After the presentation of the report, 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).

### **C. Content and Frequency of Regular Reports Provided to Clients –**

Each client of AFI's advisory services provided on an ongoing basis will receive a quarterly billing statement detailing the client's account, including assets held, asset value, and calculation of fees. Clients will also receive a monthly report from custodian as well. Each project consulting client will receive a report, allocation, or financial plan upon completion of project.

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

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### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients**

AFI does not offer or receive sales awards or prizes for providing investment advice to clients.

### **B. Compensation to Non – Advisory Personnel for Client Referrals**

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

## **Item 15: Custody**

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When advisory fees are deducted directly from client accounts at client's custodian, AFI is deemed to have limited custody of client's assets and must have written authorization from the client to do so. AFI's custodian Charles Schwab has addressed questions around the Custody Rule (Section 206(4)) of the Investment Advisors Act of 1940 through ongoing communications with clients. Therefore, AFI is in compliance with the SEC No Action letter of Feb 2017 regarding standing letters of authorization and surprise exam exemptions related to the Custody Rule. Clients will receive all custodian account statements and billing invoices that are required in each jurisdiction. Clients should carefully compare statements from the custodian to invoices or other statements they receive from AFI.

Prior to having fees deducted via a qualified custodian, Adaptfirst will:

- Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian

- Send the qualified custodian written or electronic (via direct upload) notice of the amount of the fee to be deducted from the client's account.
- Send the client an itemized invoice including any formulae 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.

AFI is also deemed to have custody by regulation if a client grants AFI limited power of attorney to transfer money in and out of an account as instructed by the client. Such power is executed by the corresponding form at the custodian and signed by the client. AFI does not have custody by any other definition. AFI representatives are not allowed to accept written transfer requests by letter, email, or text. All requests must be verbally verified with the client before being processed.

AFI has custody of the funds and securities as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee. AFI obtains written authorization from the client to deduct advisory fees from the account held with the qualified custodian. Each time a fee is directly deducted from a client account, the AFI concurrently sends the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and sends the client an invoice or statement itemizing the fee. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.

#### Item 16: Investment Discretion

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AFI 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, AFI 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. If the client makes a specific limitation for trading within their account(s), AFI will document this request and honor it when managing the client's investments.

#### Item 17: Voting Client Securities (Proxy Voting)

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AFI 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

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##### A. Balance Sheet –

AFI neither requires nor solicits prepayment of more than \$500 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 AFI nor its management has any financial condition that is likely to reasonably impair AFI's ability to meet contractual commitments to clients.

##### C. Bankruptcy Petitions in Previous Ten Years –

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

#### Item 19: Requirements for State Registered Advisers

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##### A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background –

AFI currently has only one management person: Charles Franklin Freeman, Jr. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

##### B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any) –

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

##### C. Calculation of Performance-Based Fees and Degree of Risk to Clients –

AFI 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.

##### D. Material Disciplinary Disclosures for Management Persons of this Firm –

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

##### E. Material Relationships That Management Persons Have with Issuers of Securities (If Any) –

See Item 10.C and 11.B.



## Form ADV Part 2B – Individual Disclosure Brochure

AdaptFirst Investments LLC | 336-937-0025 | 4226 Starmount Drive, Greensboro, NC 27410

**UPDATED: 3/10/2023**

### Charles Franklin Freeman Jr

Personal CRD Number: 2963226  
Investment Adviser Representative

#### Item 1: Educational Background and Business Experience

**Born:** 1974

**Education:** Bachelor of Science - Business Administration  
University of North Carolina - Chapel Hill - 1996

#### Designations: CFA – Chartered Financial Analyst

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute - the largest global association of investment professionals. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct. Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning. The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession. To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

#### Business Background:

05/2017 - Present	Managing member & CCO - AdaptFirst Investments LLC
02/2017 – 06/2019	Registered Representative - Intercarolina Financial Services, Inc.
04/2011 - 05/2017	Portfolio Manager - Holderness Investments Company
03/2013 – 02/2017	Registered Representative - The Leaders Group, Inc.
03/2006 - 04/2011	Investment Adviser Representative - AXA Advisors, LLC
09/2004 - 04/2011	Registered Representative - AXA Advisors, LLC

#### Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

#### Item 4: Other Business Activities

Charles Franklin Freeman Jr is a licensed insurance agent. (< 1 hour per month) From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a conflict of interest with the fiduciary duties of a registered investment adviser. The receipt of commissions for selling insurance or securities products gives the supervised person an incentive to recommend investment products based on the compensation received, rather than on the client's needs. AdaptFirst Investments LLC always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize these services through any representative of AdaptFirst Investments LLC in their capacity as a licensed insurance agent.

Charles Freeman currently works as a Tax Preparer, a non-investment related activity. This accounts for approximately 15 hours per month of his time. Mr. Freeman also works as a bass player for approximately 15 hours per month.

#### Item 5: Additional Compensation

Charles Franklin Freeman Jr does not receive any economic benefit from any person, company, or organization, other than AdaptFirst Investments LLC in exchange for providing clients advisory services through AdaptFirst Investments LLC.

#### Item 6: Supervision

As the Chief Compliance Officer of AdaptFirst Investments LLC, Charles Franklin Freeman Jr supervises all activities of the firm. Charles Franklin Freeman Jr Jr's contact information is on the cover page of this disclosure document. Charles Franklin Freeman Jr adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

#### Item 7: Requirements for State Registered Advisers

*This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

- A. Charles Franklin Freeman Jr has NOT been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. Charles Franklin Freeman Jr has NOT been the subject of a bankruptcy.

## Form ADV Part 2B – Individual Disclosure Brochure

AdaptFirst Investments LLC | 336-937-0025 | 4226 Starmount Drive, Greensboro, NC 27410

UPDATED: 3/7/2023

**\*\* This representative does not do business in the State of New York. \*\***

### Gabriel J. Neeriemer

Personal CRD Number: 6626206  
Investment Adviser Representative

#### Item 1: Educational Background and Business Experience

**Born:** 1977

**Education:** Associate of Science – Nuclear Medicine Technology  
Seneca College Arts and Technology - 1999

**Designations:** None

#### Business Background:

2021 – Present	Investment Adviser Representative - AdaptFirst Investments LLC
2016 – 2021	Registered Representative – Northwestern Mutual Investment Services, LLC

#### Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

#### Item 4: Other Business Activities

Gabriel Neeriemer is a licensed insurance agent. (15 hour per month) From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a conflict of interest with the fiduciary duties of a registered investment adviser. The receipt of commissions for selling insurance or securities products gives the supervised person an incentive to recommend investment products based on the compensation received, rather than on the client's needs. AdaptFirst Investments LLC always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize these services through any representative of AdaptFirst Investments LLC in their capacity as a licensed insurance agent.

Gabriel Neeriemer is an acoustic wave therapy provider with Wave Tech Therapy. He acts as Chief Technologist/Patient Educator which is a non-investment related business. This accounts for 80 hours per month of his time. He is also acts as a consultant with Biodiesel Equipment Manufacturing. This is also a non-investment related business and accounts for approximately 10 hours per month of his time.

#### Item 5: Additional Compensation

Gabriel Neeriemer does not receive any economic benefit from any person, company, or organization, other than AdaptFirst Investments LLC in exchange for providing clients advisory services through AdaptFirst Investments LLC.

#### Item 6: Supervision

As the Chief Compliance Officer of AdaptFirst Investments LLC, Charles Franklin Freeman Jr supervises all activities of the firm. Charles Franklin Freeman Jr Jr's contact information is on the cover page of this disclosure document. Gabriel Neeriemer adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

#### Item 7: Requirements for State Registered Advisers

*This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

- A. Gabriel Neeriemer has NOT been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. Gabriel Neeriemer has NOT been the subject of a bankruptcy in the last 10 years.

## Form ADV Part 2B – Individual Disclosure Brochure

AdaptFirst Investments LLC | 336-937-0025 | 4226 Starmount Drive, Greensboro, NC 27410

UPDATED: 3/10/2023

**\*\* This representative does not do business in the State of New York. \*\***

### George H. Kitchen

Personal CRD Number: 4746775  
Investment Adviser Representative

#### Item 1: Educational Background and Business Experience

**Born:** 1965

**Education:** Bachelor of Business Administration with Minor in Accounting  
Seneca College Arts and Technology - 1987

**Designations:** None

#### Business Background:

2021 – Present	Investment Advisor Representative - AdaptFirst Investments LLC
2017 – 2021	Registered Representative – MML Investors Services, LLC
2010 – 2017	Registered Representative – MSI Financial Services, Inc.
2004 – 2008	Registered Representative – Edward Jones

#### Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

#### Item 4: Other Business Activities

George Kitchen is a licensed insurance agent. (50 hour per month) From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a conflict of interest with the fiduciary duties of a registered investment adviser. The receipt of commissions for selling insurance or securities products gives the supervised person an incentive to recommend investment products based on the compensation received, rather than on the client's needs. AdaptFirst Investments LLC always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize these services through any representative of AdaptFirst Investments LLC in their capacity as a licensed insurance agent.

#### Item 5: Additional Compensation

George Kitchen does not receive any economic benefit from any person, company, or organization, other than AdaptFirst Investments LLC in exchange for providing clients advisory services through AdaptFirst Investments LLC.

#### Item 6: Supervision

As the Chief Compliance Officer of AdaptFirst Investments LLC, Charles Franklin Freeman Jr supervises all activities of the firm. Charles Franklin Freeman Jr Jr's contact information is on the cover page of this disclosure document. George Kitchen adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

#### Item 7: Requirements for State Registered Advisers

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

- A. George Kitchen has NOT been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. George Kitchen has NOT been the subject of a bankruptcy.

## Form ADV Part 2B – Individual Disclosure Brochure

AdaptFirst Investments LLC | 336-937-0025 | 4226 Starmount Drive, Greensboro, NC 27410

UPDATED: 3/24/2023

**\*\* This representative does not do business in the State of New York. \*\***

### Gregory William Schlaudecker

Personal CRD Number: 2068741

Investment Adviser Representative

#### Item 1: Educational Background and Business Experience

**Born:** 1964

**Education:** BS Mgt, University of Dayton - 1986

#### Designations: ChFC® - Chartered Financial Consultant®

ChFC® MINIMUM QUALIFICATIONS:

- Bachelor's degree or its equivalent, in any discipline, from an accredited university, this qualifies as one year of business experience
- Three years of full-time business experience is required; this three-year period must be within the five years preceding the date of the award (part-time qualifying business experience is also credited toward the three-year requirement with 2,000 hours representing the equivalent of one-year full-time experience).
- Must fulfill the ChFC® seven course curriculum, as well as two additional elective courses
- Pass the exams for all required and elective courses
- Pass a background check and candidate fitness standards test. You must reveal any criminal history, pending litigation or ethical violations. The CFP board verifies all employment history, qualifications and disciplinary issues via FINRA's Central Registration Depository.

#### Business Background:

02/2018 – Present

01/2021 - Present

01/2004 – 02/2018

01/2004 - 11/2020

Investment Adviser Representative - AdaptFirst Investments LLC

Registered Representative - Purshe Kaplan Sterling Investments

Investment Adviser Representative – InterCarolina Financial Services, Inc.

Registered Representative - InterCarolina Financial Services, Inc.

#### Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

#### Item 4: Other Business Activities

Gregory William Schlaudecker is a registered representative of Purshe Kaplan Sterling Investments (33 hr/mo) and a licensed insurance agent. (1 hr/mo) From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a conflict of interest with the fiduciary duties of a registered investment adviser. The receipt of commissions for selling insurance or securities products gives the supervised person an incentive to recommend investment products based on the compensation received, rather than on the client's needs. AdaptFirst Investments LLC always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize these services through any representative of AdaptFirst Investments LLC in their capacity as a registered representative or licensed insurance agent.

**Gregory Schlaudecker currently operates** Emerald College Planning for approximately 99 hr/mo. Mr. Schlaudecker also is a part of the Greensboro Chapter, Society for Financial Service Professionals, an organization that focuses on education, networking, and ethics. He spends approximately 44 hr/mo dedicated to this activity.

#### Item 5: Additional Compensation

Gregory William Schlaudecker does not receive any economic benefit from any person, company, or organization, other than AdaptFirst Investments LLC in exchange for providing clients advisory services through AdaptFirst Investments LLC.

#### Item 6: Supervision

As a representative of AdaptFirst Investments LLC, Gregory William Schlaudecker is supervised by Charles Freeman, the firm's Chief Compliance Officer. Charles Freeman is responsible for ensuring that Gregory William Schlaudecker adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Charles Freeman is (336) 937-0025.

#### Item 7: Requirements for State Registered Advisers

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

- A. Gregory William Schlaudecker has NOT been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. Gregory William Schlaudecker has NOT been the subject of a bankruptcy.

## Form ADV Part 2B – Individual Disclosure Brochure

AdaptFirst Investments LLC | 336-937-0025 | 4226 Starmount Drive, Greensboro, NC 27410

UPDATED: 3/27/2023

**\*\* This representative does not do business in the State of New York. \*\***

**Bobby J. Wright, Jr**

Personal CRD Number: 7306549

Investment Adviser Representative

### Item 1: Educational Background and Business Experience

**Born:** 1959

**Education:** Bachelor of Science - Business Administration  
Elon University - 1995

### Designations: CPA, CGMA

Certified Public Accountant (CPA) The CPA designation distinguishes licensed accounting professionals committed to protecting the public interest. These professionals offer financial statement audits and other attestation services to help inform investors about the financial health of organizations.

The Chartered Global Management Accountant (CGMA®) designation showcases your global value by demonstrating your leadership, people, digital and financial skills. This designation is powered by the AICPA (the American Institute of CPAs) and CIMA, two of the world's leading accounting organizations.

### Business Background:

10/2020 - Present

Investment Advisor Representative - AdaptFirst Investments LLC

### Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

### Item 4: Other Business Activities

Bobby Wright is a licensed insurance agent. (2 hour per month) From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a conflict of interest with the fiduciary duties of a registered investment adviser. The receipt of commissions for selling insurance or securities products gives the supervised person an incentive to recommend investment products based on the compensation received, rather than on the client's needs. AdaptFirst Investments LLC always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize these services through any representative of AdaptFirst Investments LLC in their capacity as a licensed insurance agent.

**Other Outside Business Activities** - Bobby J. Wright, Jr is Certified Public Accountant. (150 hours per month)

### Item 5: Additional Compensation

Bobby J. Wright, Jr does not receive any economic benefit from any person, company, or organization, other than AdaptFirst Investments LLC in exchange for providing clients advisory services through AdaptFirst Investments LLC.

### Item 6: Supervision

As the Chief Compliance Officer of AdaptFirst Investments LLC, Charles Franklin Freeman Jr supervises all activities of the firm. Charles Franklin Freeman Jr Jr's contact information is on the cover page of this disclosure document. Bobby J. Wright, Jr adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

### Item 7: Requirements for State Registered Advisers

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

- A. Bobby J. Wright, Jr has NOT been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. Bobby J. Wright, Jr has NOT been the subject of a bankruptcy.

## Form ADV Part 2B – Individual Disclosure Brochure

AdaptFirst Investments LLC | 336-937-0025 | 4226 Starmount Drive, Greensboro, NC 27410

UPDATED: 9/6/2023

**\*\* This representative does not do business in the State of New York. \*\***

### Tristen Andrew Gadberry

Personal CRD Number: 6872991  
Investment Adviser Representative

#### Item 1: Educational Background and Business Experience

**Born:** 1982

**Education:** Bachelor of Science - Business Administration  
California State University, Fullerton - 2006

**Designations:** None

#### Business Background:

01/2021 - Present	Investment Adviser Representative - AdaptFirst Investments LLC
10/2017 - 11/2020	Investment Adviser Representative - Trilogy Capital Inc

#### Item 3: Disciplinary Information

Tristen Andrew Gadberry – February 2023 – The Office of Financial Regulation of Florida found Gadberry in violation of Section 517.12(4) Florida Statutes by rendering investment advice, from a location within Florida, without being registered by the Office. Gadberry agreed to Cease and Desist from violations of Chapter 517, Florida Statutes, and the Administrative Rules adopted thereto, and to pay an administrative fine in the amount of \$9,375. The Office agreed to approve Gadberry's application as an associated person (RA) with AdaptFirst Investments LLC effective February 24, 2023. The violation occurred due to an administrative oversight with Gadberry's temporary registration and miscommunication to Gadberry by AdaptFirst Investments LLC whose registration with the state of Florida was pending at the time. The firm paid the fine in association with the decision.

#### Item 4: Other Business Activities

Tristen Andrew Gadberry is a licensed insurance agent. (5 hours per month) From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a conflict of interest with the fiduciary duties of a registered investment adviser. The receipt of commissions for selling insurance or securities products gives the supervised person an incentive to recommend investment products based on the compensation received, rather than on the client's needs. AdaptFirst Investments LLC always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize these services through any representative of AdaptFirst Investments LLC in their capacity as a licensed insurance agent.

**Other Outside Business Activities** - Fathom Realty - real estate sales (10 hours per month)

#### Item 5: Additional Compensation

Tristen Andrew Gadberry does not receive any economic benefit from any person, company, or organization, other than AdaptFirst Investments LLC in exchange for providing clients advisory services through AdaptFirst Investments LLC.

#### Item 6: Supervision

As the Chief Compliance Officer of AdaptFirst Investments LLC, Charles Franklin Freeman Jr supervises all activities of the firm. Charles Franklin Freeman Jr Jr's contact information is on the cover page of this disclosure document. Tristen Andrew Gadberry adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

#### Item 7: Requirements for State Registered Advisers

*This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

- A. Tristen Andrew Gadberry has been involved in only item 2A of the events listed below, described above in Item 3.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. Tristen Andrew Gadberry has NOT been the subject of a bankruptcy.

## **Form ADV Part 2B – Individual Disclosure Brochure**

AdaptFirst Investments LLC | 336-937-0025 | 4226 Starmount Drive, Greensboro, NC 27410

**UPDATED: 3/10/2023**

### **Leslie Garner**

Personal CRD Number: 2634511  
Investment Adviser Representative

### **Item 1: Educational Background and Business Experience**

**Born:** 1974

**Education:** BBA Finance, Emory University Goizuetta Business School - 1996

### **Designations: Certified Financial Planner (CFP)**

The Certified Financial Planner (CFP) designation is a professional certification mark for financial planners conferred by the Certified Financial Planner Board of Standards (CFP Board) in the United States, and by 25 other organizations affiliated with Financial Planning Standards Board (FPSB), the international owner of the CFP mark outside of the United States. To receive authorization to use the designation, the candidate must meet education, examination, experience and ethics requirements, and pay an ongoing certification fee. The information relates specifically to CFP certification in the United States

### **Business Background:**

AdaptFirst Investments, LLC – 10/2019 – Present – Investment Advisor Representative  
Innovation Partners LLC. - 10/2017 – 10/2019 - Investment Advisor Representative and Registered Representative  
Garner Wealth Strategies – 04/2013 to Present – Independent Insurance Agent and Financial Planner  
AXA Advisors – 01/2015 – 07/2015 – Registered Representative

### **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

### **Item 4: Other Business Activities**

Leslie Garner is a licensed insurance agent. (10 hour per month) From time to time, she will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a conflict of interest with the fiduciary duties of a registered investment adviser. The receipt of commissions for selling insurance or securities products gives the supervised person an incentive to recommend investment products based on the compensation received, rather than on the client's needs. AdaptFirst Investments LLC always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize these services through any representative of AdaptFirst Investments LLC in their capacity as a licensed insurance agent.

Leslie Garner participates in education and sales for Live Life in the Black. This accounts for approximately 3 hr/mo of her time. Leslie Garner is also a fellow with AmeriCorp which accounts for about 180 hours per month of her time.

### **Item 5: Additional Compensation**

Leslie Garner does not receive any economic benefit from any person, company, or organization, other than AdaptFirst Investments LLC in exchange for providing clients advisory services through AdaptFirst Investments LLC.

### **Item 6: Supervision**

As a representative of AdaptFirst Investments LLC, Leslie Garner is supervised by Charles Freeman, the firm's Chief Compliance Officer. Charles Freeman is responsible for ensuring that Leslie Garner adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Charles Freeman is (336) 937-0025.

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

*This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

- A. Leslie Garner has NOT been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. Leslie Garner has NOT been the subject of a bankruptcy.

## Form ADV Part 2B – Individual Disclosure Brochure

AdaptFirst Investments LLC | 336-937-0025 | 4226 Starmount Drive, Greensboro, NC 27410

UPDATED: 3/27/2023

**\*\* This representative does not do business in the State of New York. \*\***

**Michael Sterling Smith Sr.**

Personal CRD Number: 1650942

Investment Adviser Representative

### Item 1: Educational Background and Business Experience

**Born:** 1946

**Education:** Auburn University – Bachelor of Science in Textile Engineering – 1968, Bachelor of Arts in Accounting - 1972

**Designations:** **CRC, CLU, AEP, CAP, ChFC®- Chartered Financial Consultant®**

ChFC® MINIMUM QUALIFICATIONS:

- Bachelor's degree or its equivalent, in any discipline, from an accredited university, this qualifies as one year of business experience
- Three years of full-time business experience is required; this three-year period must be within the five years preceding the date of the award (part-time qualifying business experience is also credited toward the three-year requirement with 2,000 hours representing the equivalent of one-year full-time experience).
- Must fulfill the ChFC® seven course curriculum, as well as two additional elective courses
- Pass the exams for all required and elective courses
- Pass a background check and candidate fitness standards test. You must reveal any criminal history, pending litigation or ethical violations. The CFP board verifies all employment history, qualifications and disciplinary issues via FINRA's Central Registration Depository.

### Business Background:

07/2019 - Present	Investment Adviser Representative - AdaptFirst Investments LLC
01/2019 – 05/2019	Investment Advisor Representative and Registered Representative – The Leaders Group Inc.
01/2015 – 10/2018	Investment Advisor Representative and Registered Representative – Pro-equities Inc.
11/2013 – 12/2014	Investment Advisor Representative and Registered Representative – MML Investors Services LLC
05/2013 – 11/2013	Investment Advisor Representative and Registered Representative – The Leaders Group
06/2009 – 05/2013	Investment Advisor Representative and Registered Representative – NY Life Securities LLC

### Item 3: Disciplinary Information

Michael Sterling Smith Sr. – February 2011 – NC Department of Insurance and NC State Board of Certified Public Accountant Examiners found Michael Smith was not lawfully authorized to use title of “CPA” or “Certified Public Accountant” in the state of NC. A civil and administrative fine was imposed of \$250 and paid 5/24/2011.

### Item 4: Other Business Activities

Michael Sterling Smith Sr. is a licensed insurance agent. (120 hour per month) From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a conflict of interest with the fiduciary duties of a registered investment adviser. The receipt of commissions for selling insurance or securities products gives the supervised person an incentive to recommend investment products based on the compensation received, rather than on the client's needs. AdaptFirst Investments LLC always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize these services through any representative of AdaptFirst Investments LLC in their capacity as a licensed insurance agent.

**Other Outside Business Activities** - Sterling Financial (insurance, annuities, employee benefits), Landlord – Condo rentals (2 hr/mo),

### Item 5: Additional Compensation

Michael Sterling Smith Sr. does not receive any economic benefit from any person, company, or organization, other than AdaptFirst Investments LLC in exchange for providing clients advisory services through AdaptFirst Investments LLC.

### Item 6: Supervision

As a representative of AdaptFirst Investments LLC, Michael Sterling Smith Sr. is supervised by Charles Freeman, the firm's Chief Compliance Officer. Charles Freeman is responsible for ensuring that Michael Sterling Smith Sr. adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Charles Freeman is (336) 937-0025.

### Item 7: Requirements for State Registered Advisers

*This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

- A. Michael Sterling Smith Sr. has not been involved in any of the events listed below in Section 1 and has been involved in a regulatory disclosure in referenced in Section 2 below and detailed in Item 3.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. Michael Sterling Smith Sr. has NOT been the subject of a bankruptcy.



## **Form ADV Part 2B – Individual Disclosure Brochure**

AdaptFirst Investments LLC | 336-937-0025 | 4226 Starmount Drive, Greensboro, NC 27410

**UPDATED: 3/27/2023**

### **Ryan Christopher Gehsmann**

Personal CRD Number: 6201351

Investment Adviser Representative

#### **Item 1: Educational Background and Business Experience**

**Born:** 1992

**Education:** BS Business Administration, University of South Carolina - 2015

**Designations:** **Accredited Asset Management Specialist**

#### **AAMS® Designation Features:**

- 10 Modules from the College of Financial Planning covering such topic areas as asset management, performance analytics, investment strategies, taxation, retirement, ethics, insurance, and estate planning.
- Designed for approximately 80-100 hours of self-study
- Graduates may receive up to 28 CFP® CE credits, up to 45 state insurance CE credits, and 45 credits towards the College's professional designation CE requirements.

#### **Business Background:**

09/2019 – Present

Investment Adviser Representative - AdaptFirst Investments LLC

04/2017 – 09/2019

Investment Adviser Representative – Hornor, Townsend, and Kent, LLC

05/2016 – 02/2017

Investment Adviser Representative –Waddell and Reed

#### **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

#### **Item 4: Other Business Activities**

Ryan Gehsmann is a licensed insurance agent. (40-60 hour per month) From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a conflict of interest with the fiduciary duties of a registered investment adviser. The receipt of commissions for selling insurance or securities products gives the supervised person an incentive to recommend investment products based on the compensation received, rather than on the client's needs. AdaptFirst Investments LLC always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize these services through any representative of AdaptFirst Investments LLC in their capacity as a licensed insurance agent.

Ryan Gehsmann is the owner of Great Lawncare landscaping, a non-investment related business. This accounts for approximately 20 hr/mo. Ryan Gehsmann is also an event specialist with NC Fusion Lacrosse (40 hr/mo June-Nov). Mr. Gehsmann works as a tax preparer with Rosemary Ireland CPA for approximately 35 hr/mo.

#### **Item 5: Additional Compensation**

Ryan Gehsmann does not receive any economic benefit from any person, company, or organization, other than AdaptFirst Investments LLC in exchange for providing clients advisory services through AdaptFirst Investments LLC.

#### **Item 6: Supervision**

As a representative of AdaptFirst Investments LLC, Ryan Gehsmann is supervised by Charles Freeman, the firm's Chief Compliance Officer. Charles Freeman is responsible for ensuring that Ryan Gehsmann adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Charles Freeman is (336) 937-0025.

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

*This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

- A. Ryan Gehsmann has NOT been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. Ryan Gehsmann has NOT been the subject of a bankruptcy.

## Form ADV Part 2B – Individual Disclosure Brochure

AdaptFirst Investments LLC | 336-937-0025 | 4226 Starmount Drive, Greensboro, NC 27410

UPDATED: 3/7/2023

**\*\* This representative does not do business in the State of New York. \*\***

### Robert Masten

Personal CRD Number: 4451836  
Investment Adviser Representative

### Item 1: Educational Background and Business Experience

**Born:** 1950

**Education:** Bachelor of Arts – English  
University of North Carolina – Chapel Hill 1973

**Designations:** None

### Business Background:

2021 – Present	Investment Adviser Representative - AdaptFirst Investments LLC
2007 – 2021	Manager – Masten Capital Management
2001 – 2007	Financial Advisor – Wachovia Securities

### Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

### Item 4: Other Business Activities

Robert Masten works as a Bookkeeper for a Land Management company. This activity is non-investment related and accounts for approximately 2 hours per month of his time.

### Item 5: Additional Compensation

Robert Masten does not receive any economic benefit from any person, company, or organization, other than AdaptFirst Investments LLC in exchange for providing clients advisory services through AdaptFirst Investments LLC.

### Item 6: Supervision

As the Chief Compliance Officer of AdaptFirst Investments LLC, Charles Franklin Freeman Jr supervises all activities of the firm. Charles Franklin Freeman Jr Jr's contact information is on the cover page of this disclosure document. Robert Masten adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

### Item 7: Requirements for State Registered Advisers

*This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

- A. Robert Masten has NOT been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. Robert Masten has NOT been the subject of a bankruptcy.

## **Form ADV Part 2B – Individual Disclosure Brochure**

AdaptFirst Investments LLC | 336-937-0025 | 4226 Starmount Drive, Greensboro, NC 27410

**UPDATED: 3/10/2023**

### **James C. Byers, II**

Personal CRD Number: 5134439

Investment Adviser Representative

#### **Item 1: Educational Background and Business Experience**

**Born:** 1980

**Education:** Masters of Business Administration, UNC Pembroke - 2021  
BS Accounting, North Carolina A&T State University – 2003

#### **Professional Designations: Financial Services Certified Professional (FSCP)**

The Financial Services Certified Professional® (FSCP®) designation offers the most essential product knowledge, and marketing and planning skills training available to financial services professionals today. Taught by industry experts, and reflective of current trends and market realities like social media and regulatory constraints, the practical and relevant skills advisors learn can be applied right away.

#### **Business Background:**

AdaptFirst Investments, LLC – 11/2019- Present – Investment Advisor Representative  
Innovation Partners LLC – 10/2017 – 11/2019 – Registered Representative and Investment Advisor Representative  
Byers Wealth Strategies 10/2017 – Present – Owner  
Pruco Securities LLC – 02/2014 – 09/2017 - Consulting Actuary and Managing Director  
Metlife Securities Inc. - 04/2010 - 01/2014 - Sales Representative  
Wells Fargo Advisors LLC - 04/2006 - 04/2010 - Registered Representative  
Wachovia Securities - 04/2006 – 09/2006 – Financial Advisor

#### **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

#### **Item 4: Other Business Activities**

James Byers II is a licensed insurance agent. (50 hours per month) From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a conflict of interest with the fiduciary duties of a registered investment adviser. The receipt of commissions for selling insurance or securities products gives the supervised person an incentive to recommend investment products based on the compensation received, rather than on the client's needs. AdaptFirst Investments LLC always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize these services through any representative of AdaptFirst Investments LLC in their capacity as a licensed insurance agent.

**James Byers owns a** Rental Property for which he works 1 hr/mo, this is a non-investment related business. Mr. Byers acts as a musician 40 hr/mo. Mr. Byers also spends approximately 36 hr/mo as an university adjunct professor.

#### **Item 5: Additional Compensation**

James Byers II does not receive any economic benefit from any person, company, or organization, other than AdaptFirst Investments LLC in exchange for providing clients advisory services through AdaptFirst Investments LLC.

#### **Item 6: Supervision**

As a representative of AdaptFirst Investments LLC, James Byers II is supervised by Charles Freeman, the firm's Chief Compliance Officer. Charles Freeman is responsible for ensuring that James Byers II adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Charles Freeman is (336) 937-0025.

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

*This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

- A. James Byers II has NOT been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. James Byers II has NOT been the subject of a bankruptcy.

## **Form ADV Part 2B – Individual Disclosure Brochure**

AdaptFirst Investments LLC | 336-937-0025 | 4226 Starmount Drive, Greensboro, NC 27410

**UPDATED: 3/10/2023**

**\*\* This representative does not do business in the State of New York. \*\***

### **James Joseph Eddington**

Personal CRD Number: 3260578

Investment Adviser Representative

#### **Item 1: Educational Background and Business Experience**

**Born:** 1967

**Education:** MBA Business, University of Indianapolis - 1998

Bachelors Econ, Indiana University - 1991

#### **Designations: ChFC®- Chartered Financial Consultant®**

ChFC® MINIMUM QUALIFICATIONS:

- Bachelor's degree or its equivalent, in any discipline, from an accredited university, this qualifies as one year of business experience
- Three years of full-time business experience is required; this three-year period must be within the five years preceding the date of the award (part-time qualifying business experience is also credited toward the three-year requirement with 2,000 hours representing the equivalent of one-year full-time experience).
- Must fulfill the ChFC® seven course curriculum, as well as two additional elective courses
- Pass the exams for all required and elective courses
- Pass a background check and candidate fitness standards test. You must reveal any criminal history, pending litigation or ethical violations. The CFP board verifies all employment history, qualifications and disciplinary issues via FINRA's Central Registration Depository.

#### **Business Background:**

01/2019 - Present	Investment Adviser Representative - AdaptFirst Investments LLC
05/2011 - Present	Insurance Broker - Self employed
03/2015 - 02/2018	Managing Associate / Insurance Broker & Financial - MassMutual
10/2011 - 01/2015	Marketing Director / Insurance Broker & Financial - MetLife
01/2008 - 12/2011	Co-Owner - Circle City Auctions

#### **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

#### **Item 4: Other Business Activities**

James Joseph Eddington is a licensed insurance agent. (40 hour per month) From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a conflict of interest with the fiduciary duties of a registered investment adviser. The receipt of commissions for selling insurance or securities products gives the supervised person an incentive to recommend investment products based on the compensation received, rather than on the client's needs. AdaptFirst Investments LLC always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize these services through any representative of AdaptFirst Investments LLC in their capacity as a licensed insurance agent.

#### **Item 5: Additional Compensation**

James Joseph Eddington does not receive any economic benefit from any person, company, or organization, other than AdaptFirst Investments LLC in exchange for providing clients advisory services through AdaptFirst Investments LLC.

#### **Item 6: Supervision**

As a representative of AdaptFirst Investments LLC, James Joseph Eddington is supervised by Charles Freeman, the firm's Chief Compliance Officer. Charles Freeman is responsible for ensuring that James Joseph Eddington adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Charles Freeman is (336) 937-0025.

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

*This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

- A. James Joseph Eddington has NOT been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. James Joseph Eddington has NOT been the subject of a bankruptcy.