## Item 1: Cover Page



## Ford Financial Solutions, LLC

1345 Avenue of the Americas New York, NY 10105

## Form ADV Part 2A — Firm Brochure

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www.fordfinancialsolutions.com

Dated February 28, 2024

This Brochure provides information about the qualifications and business practices of Ford Financial Solutions, LLC ("FFS"). If you have any questions about the contents of this Brochure, please contact us at (212) 799-0631. 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.

FFS is registered as an Investment Adviser with the State of New York. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about FFS is available on the SEC's website at  $\underline{www.adviserinfo.sec.gov}$  which can be found using the firm's identification number 282588.

# Item 2: Material Changes

The Material Changes section of this brochure will be updated annually, or when material changes occur since the previous release of the Firm Brochure. There are no material changes since our last filing on October 3, 2023.

# Item 3: Table of Contents

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# Item 4: Advisory Business

## **Description of Advisory Firm**

Ford Financial Solutions, LLC is registered as an Investment Adviser with the States of New York, Louisiana, and Texas. We were founded on March 6, 2015. Julie E. Ford is the principal owner of FFS. We currently report \$18,436,808 in client assets on a discretionary basis. We do not manage any client assets on a non-discretionary basis.

## **Types of Advisory Services**

## **Comprehensive Financial Planning**

Our Comprehensive Financial Planning service involves working one-on-one with a financial planner over an extended period of time. By paying an initial upfront and monthly fee, clients get continuous access to a planner who will work with them to design their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up to date. Engagements typically last for a minimum of 6 or 12 months, depending on the complexity of the client's situation.

Clients will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning and estate planning. Once the client's information is reviewed, their plan will be analyzed and updated to address potential changes to their current situation and will be reviewed with the client. Clients subscribing to this service will receive an annual updated financial plan and ongoing access to the financial planner. The plan and the client's financial situation and goals will be monitored throughout the year. As long as the relationship remains on a retainer basis, at least annually there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.

#### **Investment Management**

As part of our Comprehensive Financial Planning service, we offer investment management services by referring clients, where appropriate, to third-party asset management managers ("Outside Managers") for portfolio management services. We assist clients in selecting an appropriate allocation model, completing the Outside Manager's investor profile questionnaire,

interacting with the Outside Manager and reviewing the Outside Manager. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. Client may impose reasonable restrictions on their account. Additionally, we will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account.

### **Comprehensive Financial Planning Topics**

Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information and analysis will be considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

The client always has the right to decide whether or not to act upon our recommendations. If the client elects to act on any of the recommendations, the client always has the right to effect the transactions through anyone of their choosing.

In general, the financial plan will address any or all of the following areas of concern. The client and advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

- Business Planning: We provide consulting services for clients who currently operate
  their own business, are considering starting a business, or are planning for an exit from
  their current business. Under this type of engagement, we work with you to assess your
  current situation, identify your objectives, and develop a plan aimed at achieving your
  goals.
- Cash Flow and Debt Management: We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

- College Savings: Includes projecting the amount that will be needed to achieve college
  or other post-secondary education funding goals, along with advice on ways for you to
  save the desired amount. Recommendations as to savings strategies are included, and, if
  needed, we will review your financial picture as it relates to eligibility for financial aid or
  the best way to contribute to grandchildren (if appropriate).
- **Employee Benefits Optimization**: We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- Estate Planning: This usually includes an analysis of your exposure to estate taxes and
  your current estate plan, which may include whether you have a will, powers of attorney,
  trusts and other related documents. Our advice also typically includes ways for you to
  minimize or avoid future estate taxes by implementing appropriate estate planning
  strategies such as the use of applicable trusts.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- Financial Goals: We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- Insurance: Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- Investment Analysis: This may involve developing an asset allocation strategy to meet
  clients' financial goals and risk tolerance, providing information on investment vehicles
  and strategies, reviewing employee stock options, as well as assisting you in establishing
  your own investment account at a selected broker/dealer or custodian. The strategies
  and types of investments we may recommend are further discussed in Item 8 of this
  brochure.

Retirement Planning: Our retirement planning services typically include projections of
your likelihood of achieving your financial goals, typically focusing on financial
independence as the primary objective. For situations where projections show less than
the desired results, we may make recommendations, including those that may impact
the original projections by adjusting certain variables (e.g., working longer, saving more,
spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- Risk Management: A risk management review includes an analysis of your exposure to major risks that could have a significantly adverse effect on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").
- Tax Planning Strategies: Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may affect your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

## Educational Seminars, Speaking Engagements, and Online Education Courses & Content

We offer periodic financial educational sessions to organizations and the public on a variety of financial topics. We may also provide online educational courses and content on our website for a fee. The content of these seminars and courses will vary depending upon the needs of the attendees. Topics may include issues related to financial planning, college funding, estate planning, retirement strategies, the financial implications of marriage or divorce, or various

other economic and investment topics. Our sessions are educational in nature and do not involve the sale of insurance or investment products. Information presented will not be based on any one person's need nor do we provide individualized investment advice to attendees during our general sessions.

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

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon a client Investment Policy Statement, which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

## **Wrap Fee Programs**

We do not participate in wrap fee programs.

## **Item 5: Fees and Compensation**

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory and financial planning agreement, the agreement may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees and without penalty. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

## **Ongoing Comprehensive Financial Planning and Investment Management**

Ongoing Comprehensive Financial Planning is offered for an initial upfront fee ranging between \$1,500 and \$5,000 and an ongoing fee that is paid monthly, in advance, at the rate of \$200 - \$1,500 per month. The fee is determined by us at our sole discretion, based on the complexity of the client's circumstances. The fee may be negotiable in certain cases. Advisory fees may be directly debited from client accounts, or the client may pay electronically via AdvicePay.

If the client chooses to pay the fee from an investment account, fees are pro-rated and paid in advance on a quarterly basis. The Outside Manager will debit the client's account for both the

Outside Manager's fee and FFS's financial planning fee (if the client desires), and will remit FFS's fee to FFS. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement. This service may be terminated with 30 days' notice. Upon termination of any account, the fee will be prorated and any unearned fee will be refunded to the client.

Ongoing Comprehensive Financial Planning may include discretionary Investment Management, a service provided through our collaborative arrangements with Betterment for Advisors and First Ascent Asset Management, which are outside investment managers not affiliated with FFS. FFS's Investment Management service is included in FFS's fee for clients who engage us for Ongoing Comprehensive Financial Planning, but the Outside Manager does charge a separate fee to the client. Fees associated with third party managers will vary and will be fully disclosed to you before any manager is retained on your behalf. Fees will be described in detail in your investment advisory agreement and in the manager's ADV Disclosure Brochure.

## **One-time Comprehensive Financial Planning**

One-time Comprehensive Financial Planning is generally offered on a fixed fee basis. The fixed fee will be agreed upon before the start of any work. The fixed fee can range from \$2,500 to \$7,000. FFS will not bill an amount above \$500 more than 6 months in advance. In the event of early termination, the client will be billed for the hours worked at a rate of \$400 per hour. If the initial deposit is greater than the amount billed, then the client will be refunded the difference. If the initial deposit is less, then the client will be billed the difference.

## **Financial Planning Hourly Fee**

When offered on an hourly basis, the fee for Financial Planning ranges between \$350 and \$550 per hour, depending on complexity. The fee may be negotiable in certain cases and is due at the completion of the engagement. In the event of early termination by the client, any fees for the hours already worked will be due.

# Educational Seminars, Speaking Engagements, and Online Education Courses & Content

Julie Ford currently offers seminars, accepts speaking engagements, and provides online education content and courses, per the below:

#### **Online Educational Courses & Content**

Educational courses and content are offered via our website to the public on a variety of financial topics. Fees range from free to \$500 per course. Fees are to be paid prior to obtaining access to the course. The fee is refundable to individuals who complete the entire course and are not satisfied. The fee range is based on the content, amount of research conducted and number of hours of preparation needed.

#### **Educational Seminars**

Educational seminar attendees may be assessed a per-session fee ranging from free to \$1,000. The fee will be announced in advance of the workshop and will be due prior to the start of the event. The fee range is based on the content, amount of research conducted, number of hours of preparation needed, number of attendees, length of the event, and whether or not educational materials are being provided.

In the event of inclement weather or a flight cancellation, the Speaker shall make all reasonable attempts to make alternative travel arrangements to arrive in time for the presentation. If travel proves impracticable, or the event is otherwise canceled, the Speaker's fee is waived, but the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred. In the event that the Client decides to cancel or change the date of the event for any reason besides weather or similar unforeseen causes, the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred, and will provide payment for 50% of the Speaker's fee if the cancellation occurs within 30 days of the event. In the event that the Speaker must cancel due to health or similar unforeseen circumstances, the Speaker will make all attempts to find a reasonable alternative engagement date and will absorb any incremental additional costs for obtaining alternative travel arrangements. If an alternative date cannot be obtained, the Client will not be responsible for any travel costs already incurred by the Speaker or any portion of the Speaker's fee.

### **Speaking Engagements**

Julie Ford is a public speaker. Generally, fees for her speaking engagements range from \$500 to \$10,000 plus travel expenses, depending on sponsor, date, location, and program requested. For all speaking engagements, 50% of the balance is due before the event and the remaining balance due at the conclusion of the event. The fee range is based on the content, amount of research conducted, number of hours of preparation needed, and the number of attendees. The content is based on topics that are currently relevant in the financial planning environment.

In the event of inclement weather or a flight cancellation, the Speaker shall make all reasonable attempts to make alternative travel arrangements to arrive in time for the presentation. If travel

proves impracticable, or the event is otherwise canceled, the Speaker's fee is waived, but the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred. In the event that the Client decides to cancel or change the date of the event for any reason besides weather or similar unforeseen causes, the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred, and will provide payment for 50% of the Speaker's fee if the cancellation occurs within 30 days of the event. In the event that the Speaker must cancel due to health or similar unforeseen circumstances, the Speaker will make all attempts to find a reasonable alternative engagement date and will absorb any incremental additional costs for obtaining alternative travel arrangements. If an alternative date cannot be obtained, the Client will not be responsible for any travel costs already incurred by the Speaker or any portion of the Speaker's fee.

Educational seminars, speaking engagements, and online educational content and courses may be provided pro-bono at FFS's discretion.

## Other Types of Fees and Expenses

When implementing an investment recommendation, the client may incur additional fees such as brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by broker-dealers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees.

# **Item 7: Types of Clients**

We provide financial planning services to individuals. We do not have a minimum account size requirement.

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

### **Methods of Analysis**

When clients have us complete an Investment Analysis (described in Item 4 of this brochure) as part of their financial plan, our primary investment strategy is passive investment. Our research is drawn from sources that include financial periodicals, reports from economists and other industry professionals, annual reports as well as prospectuses and other regulatory filings. We also evaluate economic factors including interest rates, the current state of the economy, or the future growth of an industry sector.

We employ the use of outside managers. Our analysis of outside managers involve the examination of the experience, expertise, investment philosophies, and past performance of the outside managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that he/she may not be able to replicate that success in the future.

In addition, as we do not control the underlying investments in an outside manager's portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

#### **Passive Investment Management**

We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market.

#### **Material Risks Involved**

All investing strategies we offer involve risk and may result in a loss of your original investment, which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

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

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

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

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

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

**Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

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

**Legal or Legislative Risk**: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

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

**Passive Investing**: A portfolio which employs a passive, efficient markets approach has the potential risk at times to generate lower -than- expected returns for the broader allocation than might be the case for a more narrowly focused asset class, and the return on each type of asset may be deviation from the average return for the asset class.

#### **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Common Stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

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

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

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases

in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which clients invest.

# **Item 9: Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of FFS or the integrity of our management. FFS has no information to disclose applicable to this Item.

# Item 10: Other Financial Industry Activities and Affiliations

No FFS employee is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No FFS employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Julie Ford's spouse, Anthony Ford, is the owner and principal of Ford Law, PLLC, a law firm located in New York, NY. FFS refers clients when appropriate to Ford Law. FFS receives no compensation for such referrals, though Julie Ford indirectly benefits as the spouse of Ford Law's owner. Separately, Anthony also performs work in a non-legal capacity for FFS and currently serves in the role of Financial Planner and Director of Operations.

FFS only receives compensation directly from clients. We do not receive compensation from any outside source.

#### Recommendations or Selections of Other Investment Advisers

As referenced in Item 4 of this brochure, FFS may recommend clients to an Outside Manager for investment management. In the event that we recommend an Outside Manager, please note that we do not share in their advisory fee. Our fee is separate from and in addition to their compensation (as noted in Item 5), and will be described to you prior to engagement. You are

not obligated, contractually or otherwise, to use the services of any Outside Manager we recommend. Additionally, FFS will only recommend an Outside Manager who is properly licensed or registered as an investment adviser.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

## **Code of Ethics Description**

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity Associated persons shall offer and provide professional services with integrity.
- Objectivity Associated persons shall be objective in providing professional services to clients.
- **Competence** Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- **Fairness** Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality Associated persons shall not disclose confidential client information
  without the specific consent of the client unless in response to proper legal process, or
  as required by law.

- Professionalism Associated persons' conduct in all matter shall reflect credit of the profession.
- **Diligence** Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide of copy of its Code of Ethics to any client or prospective client upon request.

# Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

# Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its "related persons" do not invest in the same securities, or related securities, e.g., warrants, options or futures, which we recommend to clients.

## Trading Securities at/Around the Same Time as Client's Securities

Because our firm and its "related persons" do not invest in the same securities, or related securities, e.g., warrants, options or futures, which we recommend to clients, we do not trade in securities at or around the same time as clients.

# **Item 12: Brokerage Practices**

## Factors Used to Select Custodians and/or Broker-Dealers

Ford Financial Solutions, LLC does not have any affiliation with Broker-Dealers. We seek to recommend a custodian that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

Capability to execute, clear, and settle trades (buy and sell securities for your account)

itself or to facilitate such services.

- Capability to facilitate timely transfers and payments to and from accounts.
- Availability of investment research and tools that assist us in making investment decisions.
- Quality of services.
- Competitiveness of the price of those services and willingness to negotiate the prices.
- Reputation, financial strength, and stability.
- Prior service to us and our other clients.
- 1. Research and Other Soft-Dollar Benefits. Advisor does not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client. However, as a result of being on their institutional platform, Schwab and Betterment may provide us with certain services and products that may benefit us. All such soft dollar benefits are consistent with the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended.
- **2. Brokerage for Client Referrals.** We receive 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. We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice.

## The Custodian and Brokers We Use (Betterment & Schwab)

FFS does not maintain custody of your assets on which we advise, although we may be deemed to have constructive or limited custody of your assets if you give us authority to withdraw advisory fees from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank.

Our firm recommends Charles Schwab & Co., Inc., a registered broker-dealer, member FINRA and SIPC ("Schwab") and MTG, LLC dba Betterment Securities ("Betterment Securities"), a registered broker-dealer and member of the SIPC, as qualified custodians. Although Clients may request us to use a custodian of their choosing, we generally recommend that Clients open brokerage accounts with Schwab or Betterment Securities. We are not affiliated with Schwab or Betterment Securities. The Client will ultimately make the final decision of the custodian to be used to hold the Client's investments by signing the selected custodian's account opening

documentation. Schwab and Betterment Securities will hold your assets in a brokerage account and buy and sell securities when we and/or you instruct them to.

### Schwab Advisor Services™

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide our Clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our Clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The benefits received by Advisor or its personnel do not depend on the number of brokerage transactions directed to Schwab. As part of its fiduciary duties to Clients, Advisor at all times must put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Schwab for custody and brokerage services. This conflict of interest is mitigated as Advisor regularly reviews the factors used to select custodians to ensure our recommendation is appropriate. Following is a more detailed description of Schwab's support services:

- Services that benefit you. Schwab's institutional brokerage services include access to a
  broad range of investment products, execution of securities transactions, and custody of
  Client assets. The investment products available through Schwab include some to which
  we might not otherwise have access or that would require a significantly higher
  minimum initial investment by our Clients. Schwab's services described in this paragraph
  generally benefit you and your account.
- 2. **Services that may not directly benefit you.** Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our Clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our Clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- a. Provide access to Client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple Client accounts
- c. Provide pricing and other market data
- d. Facilitate payment of our fees from our Clients' accounts
- e. Assist with back-office functions, recordkeeping, and Client reporting
- 3. **Services that generally benefit only us.** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:
  - a. Educational conferences and events
  - b. Consulting on technology, compliance, legal, and business needs
  - c. Publications and conferences on practice management and business succession
- 4. Your brokerage and custody costs. For our Clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees.

### **Betterment Securities**

Betterment Securities serves as broker-dealer to Betterment for Advisors, an investment and advice platform serving independent investment advisory firms like us ("Betterment for Advisors"). Betterment for Advisors also makes available various support services which may not be available to Betterment's retail customers. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Betterment for Advisors' support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Betterment for Advisors' support services:

- Services that benefit you. Betterment for Advisors includes access to a globally diversified, low-cost portfolio of ETFs, execution of securities transactions, and custody of client assets through Betterment Securities. In addition, a series of model portfolios created by third-party providers are also available on the platform. Betterment Securities' services described in this paragraph generally benefit you and your account.
- 2. Services that may not directly benefit you. Betterment for Advisors also makes available

to us other products and services that benefit us, but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts, such as software and technology that may:

- a. Assist with back-office functions, recordkeeping, and client reporting of our clients' accounts.
- b. Provide access to client account data (such as duplicate trade confirmations and account statements).
- c. Provide pricing and other market data.
- 3. **Services that generally benefit only us.** By using Betterment for Advisors, we may be offered other services intended to help us manage and further develop our business enterprise. These services include:
  - a. Consulting (including through webinars) on technology and business needs.
  - Access to publications and conferences on practice management and business succession.
- 4. Your brokerage and custody costs. For our clients' accounts that Betterment Securities maintains, Betterment Securities does not charge you separately for custody/brokerage services, but is compensated as part of the Betterment for Advisors (defined below) platform fee, which is charged for a suite of platform services, including custody, brokerage, and sub-advisory services provided by Betterment and access to the Betterment for Advisors platform. The platform fee is an asset-based fee charged as a percentage of assets in your Betterment account. Clients utilizing the Betterment for Advisors platform may pay a higher aggregate fee than if the investment management, brokerage and other platform services are purchased separately. Nonetheless, for those Clients participating in the Betterment for Advisors platform, we have determined that having Betterment Securities execute trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors.

### **OUR INTEREST IN BETTERMENT SECURITIES' SERVICES**

The availability of these services from Betterment Institutional benefits us because we do not have to produce or purchase them. In addition, we don't have to pay for Betterment Securities' services. These services may be contingent upon us committing a certain amount of business to Betterment Securities in assets in custody. We may have an incentive to recommend that you maintain your account with Betterment Securities, based on our interest in receiving Betterment Institutional and Betterment Securities' services that benefit our business rather

than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Betterment Securities as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities' services (see "How we select brokers/custodians") and not Betterment Institutional and Betterment Securities' services that benefit only us.

#### BETTERMENT FOR ADVISORS' TRADING POLICY

When using the Betterment for Advisors platform, we and you are subject to the trading policies and procedures established by Betterment. These policies and procedures limit our ability to control, among other things, the timing of the execution of certain trades (including in response to withdrawals, deposits, or asset allocation changes) within your account. You should not expect that trading on Betterment is instant, and, accordingly, you should be aware that Betterment does not permit you or us to control the specific time during a day that securities are bought or sold in your account (i.e., to "time the market"). Betterment describes its trading policies in Betterment LLC's Form ADV Part 2A. As detailed in that document, Betterment generally trades on the same business day as it receives instructions from you or us. However, transactions will be subject to processing delays in certain circumstances. In particular, orders initiated on non-business days and after markets close generally will not transact until the next business day. Betterment also maintains a general approach of not placing securities orders during approximately the first thirty minutes after the opening of any market session. Betterment also generally stops placing orders arising from allocation changes in existing portfolios approximately thirty minutes before the close of any market session. Betterment continues placing orders associated with deposit and withdrawal requests until market close. Betterment maintains a general approach of not placing orders around the time of scheduled Federal Reserve interest rate announcements. Furthermore, Betterment may delay or manage trading in response to market instability. For further information, please consult Betterment LLC's Form ADV Part 2A.

## **Aggregating (Block) Trading for Multiple Client Accounts**

Outside Managers used by FFS may block client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12. Generally, we do not combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading").

## Item 13: Review of Accounts

Client accounts with the Investment Management Service will be reviewed regularly on at least an annual basis by Julie Ford, Owner and CCO. The account is reviewed with regards to the client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

FFS will not provide written reports to Investment Management clients, other than financial plans.

# Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly from any third party for advice rendered to our clients. Nor do we directly or indirectly compensate any person who is not advisory personnel for client referrals.

We receive a non-economic benefit from Schwab, Betterment Institutional and Betterment Securities in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab or Betterment Securities. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of Schwab, Betterment Institutional and Betterment Securities' products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

# Item 15: Custody

FFS does not have custody, except for in the instance of withdrawing client fees. FFS sends a copy of the invoice to the custodian or trustee at the same time a copy is sent to the client. The custodian sends quarterly statements to the client showing all disbursements for the custodian account, including the amount of the advisory fees. Clients provide written authorization permitting FFS to be paid directly for their accounts held by the custodian or trustee. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. You should carefully review those statements promptly.

## Item 16: Investment Discretion

For those client accounts where we provide investment management services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client.

FFS will have discretion to facilitate the selection of, and changes to, the Betterment For Advisors portfolio allocation. Betterment For Advisors provides software tools for advisors to facilitate the purchase and sale of securities in the client's accounts, including the amounts of securities to be bought and sold to align with the client's goals and risk tolerance, through a series of 101 incremental model portfolio allocations ranging from 0% to 100% in equities.

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

FFS does not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all

proxies and shareholder communications relating to the Client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

## Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

# Item 19: Requirements for State-Registered Advisers

Julie E. Ford

Born: 1983

## **Educational Background**

- 2007 Bachelor of Business Administration in Accountancy, Texas A & M University
- 2007 Masters in Science in Accountancy, Texas A & M University

## **Business Experience**

- 03/2015 Present, Ford Financial Solutions, LLC, Financial Planner, Owner and CCO
- 03/2010 07/2012, Kramer Financial Group, LLC, Director of Client Services
- 09/2009 03/2010, Lesavoy Financial Perspectives, Inc., Associate
- 07/2007 09/2009, Ernst & Young, LLP, Senior Accountant

## **Professional Designations, Licensing & Exams**

**CFP (Certified Financial Planner)** \*: CFP\* certificants must have a minimum of three years' workplace experience in financial planning and develop their theoretical and practical financial planning knowledge by completing a comprehensive course of study approved by CFP\* Board. They must pass a comprehensive CFP\* Certification Examination that tests their ability to apply financial planning knowledge in an integrated format. As a final step to certification, CFP\* practitioners agree to abide by a strict code of professional conduct.

CPA (Certified Public Accountant): CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

### **Other Business Activities**

Julie E. Ford sometimes serves as an expert witness in legal proceedings. When doing so, this activity accounts for approximately 10% of her time.

### **Performance Based Fees**

FFS is not compensated by performance-based fees.

## **Material Disciplinary Disclosures**

No management person at Ford Financial Solutions, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have with Issuers of Securities

Neither Ford Financial Solutions, LLC nor Julie E. Ford, have any relationship or arrangement with issuers of securities.

## Ford Financial Solutions, LLC

1345 Avenue of the Americas New York, NY 10105 (212) 799-0631

www.fordfinancialsolutions.com

Dated February 28, 2024

# Form ADV Part 2B – Brochure Supplement for Julie E. Ford

## Julie E. Ford

Financial Planner, Owner, and Chief Compliance Officer

This brochure supplement provides information about Julie E. Ford that supplements the Ford Financial Solutions, LLC ("FFS") brochure. A copy of that brochure precedes this supplement. Please contact Julie E. Ford if the FFS brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Julie E. Ford is available on the SEC's website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> which can be found using the identification number 5551913.

# Item 2: Educational Background and Business Experience

Julie E. Ford

Born: 1983

## **Educational Background**

- 2007 Bachelor of Business Administration in Accountancy, Texas A & M University
- 2007 Masters in Science in Accountancy, Texas A & M University

## **Business Experience**

- 03/2015 Present, Ford Financial Solutions, LLC, Financial Planner, Owner and CCO
- 03/2010 07/2012, Kramer Financial Group, LLC, Director of Client Services
- 09/2009 03/2010, Lesavoy Financial Perspectives, Inc., Associate
- 07/2007 09/2009, Ernst & Young, LLP, Senior Accountant

## **Professional Designations, Licensing & Exams**

**CFP (Certified Financial Planner)** \*: CFP\* certificants must have a minimum of three years' workplace experience in financial planning and develop their theoretical and practical financial planning knowledge by completing a comprehensive course of study approved by CFP Board. They must pass a comprehensive CFP\* Certification Examination that tests their ability to apply financial planning knowledge in an integrated format. As a final step to certification, CFP\* practitioners agree to abide by a strict code of professional conduct.

CPA (Certified Public Accountant): CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due

care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

# **Item 3: Disciplinary Information**

No management person at Ford Financial Solutions, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## Item 4: Other Business Activities

Julie E. Ford sometimes serves as an expert witness in legal proceedings. When doing so, this activity accounts for approximately 10% of her time.

## **Item 5: Additional Compensation**

Julie E. Ford does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through FFS.

## Item 6: Supervision

Julie E. Ford, as Owner and Chief Compliance Officer of FFS, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

# Item 7: Requirements for State Registered Advisers

Julie E. Ford, in her individual capacity, has not been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

## Ford Financial Solutions, LLC

1345 Avenue of the Americas New York, NY 10105 (212) 799-0631

www.fordfinancialsolutions.com
Dated February 28, 2024

# Form ADV Part 2B – Brochure Supplement for Anthony J. Ford

## Anthony J. Ford

### **Financial Planner**

This brochure supplement provides information about Anthony J. Ford that supplements the Ford Financial Solutions, LLC ("FFS") brochure. A copy of that brochure precedes this supplement. Please contact Anthony J. Ford if the FFS brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Anthony J. Ford is available on the SEC's website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> which can be found using the identification number 7305628.

# Item 2: Educational Background and Business Experience

## Anthony J. Ford

Born: 1982

## **Educational Background**

- 2005 AB, Princeton University
- 2008 JD, New York University School of Law

## **Business Experience**

- 01/2019 Present: Ford Financial Solutions, LLC, Financial Planner and Director of Operations
- 10/2017 Present: Ford Law, PLLC, Founder
- 06/2014 02/2017: Prospect Capital, Vice President Legal
- 05/2012 06/2014: Winston & Strawn LLP, Associate
- 09/2008 05/2012: Dewey & LeBoeuf, Associate

## **Professional Designations, Licensing & Exams**

**CFP (Certified Financial Planner)** \*: CFP\* certificants must have a minimum of three years' workplace experience in financial planning and develop their theoretical and practical financial planning knowledge by completing a comprehensive course of study approved by CFP Board. They must pass a comprehensive CFP\* Certification Examination that tests their ability to apply financial planning knowledge in an integrated format. As a final step to certification, CFP\* practitioners agree to abide by a strict code of professional conduct.

**Licensed Attorney (New York):** To be admitted to practice law in the State of New York, an individual must satisfy the rules promulgated by the New York Court of Appeals. This generally requires graduating from an accredited law school and passing the New York State bar examination, among other requirements. Anthony does not practice law through FFS.

# Item 3: Disciplinary Information

No management person at Ford Financial Solutions, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## Item 4: Other Business Activities

Anthony J. Ford is the owner of Ford Law, PLLC where he provides legal services. This activity accounts for approximately 50% of his time.

# Item 5: Additional Compensation

Anthony J. Ford does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through FFS.

# Item 6: Supervision

Anthony J. Ford, is supervised by Julie Ford as Owner and Chief Compliance Officer of FFS. Julie may be contacted at the phone number on this brochure supplement.

# Item 7: Requirements for State Registered Advisers

Anthony J. Ford, in his individual capacity, has not been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.