



FOREFRONT

Form ADV Part 2A

FIRM BROCHURE FORM

Form ADV Part 2B

BROCHURE SUPPLEMENT

DATED APRIL 4, 2023

This Brochure provides information about the qualifications and business practices of Forefront ("FWP"). If you have any questions about the contents of this Brochure, please contact FWP's CCO, Chad Rixse, at (512) 617-1984. 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.

Forefront is registered as an Investment Adviser with the State(s) of TX, AK, CA, FL, OH, and WA. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about FWP is available on the SEC's website at www.adviserinfo.sec.gov which can be found using FWP's identification number 308521.

ITEM 2

Material Changes

The material change made to this Form ADV Part 2A since the filing dated March 28, 2023 is as follows:

- Added terms for an outside manager relationship. Please see Item 4 for details.
- Added StoneCastle Cash Management as a third party manager. Please see Items 4 and 5 for details.
- Axos has been added as a custodian. Please see Item 12 for details.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of FWP.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for our firm name or by our CRD number 308521. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (512) 617-1984 or by emailing our Chief Compliance Officer, Chad Rixse, at chad@forefrontwp.com.

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ITEM 4

Advisory Business

Description of Advisory Firm

Forefront ("FWP") is registered as an Investment Adviser with the States of Texas, Alaska, California, Florida, Ohio, Texas, and Washington and has an application for registration pending in Massachusetts. We were founded as a standalone Registered Investment Adviser in September 2021. Eric Negron (CRD# 5378359) is the principal owner of FWP. As of March 2, 2023 FWP has \$51,647,004 in Discretionary Assets Under Management and \$830,402 in Non-Discretionary Assets Under Management.

Types of Advisory Services

Investment Management Services

We are in the business of managing investment portfolios. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation target. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the client (e.g., aggressive growth, growth, growth with income, or safety of principal), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

In cases where the client chooses to have FWP advise on assets that are not held at a qualified custodian with which FWP has an advisory relationship (See Item 12 of this Part 2A), FWP is able to provide investment management services of those held-away accounts through a third-party portfolio management provider, FeeX. Such accounts will be studied, analyzed, asset-allocated, monitored, managed, tactically adjusted and rebalanced when necessary and periodically reviewed by FWP in detail on behalf of the client, taking into account the client's evolving individual circumstances, goals and objectives.

Access to held-away accounts is achieved by the client giving permission via a provided link through Pontera for FWP to make asset allocation changes via the client's online login credentials. These online credentials are never made available to, held or stored by FWP. Access is restricted and FWP will only have permissions to make changes to the allocation of funds or other securities in the account and will not at any time be able to adjust, add to or subtract from investment options, or any other plan policies or fees assessed by the plan or the fund providers, access the financial assets in the account, make deposits, withdrawals or distributions. These assets will be monitored using third party account aggregation software whereby the account values and holdings are transmitted and viewed from the account aggregation software. These assets are included in calculating the total assets under management when assessing the annual advisory fee.

Use of Third Party Managers, Outside Managers, or Sub-Advisors (TAMPs)

We offer the use of Third Party Managers, Outside Managers, or Sub-Advisors (TAMPs) 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.

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. Fees pertaining to this service are outlined in Item 5 of this brochure.

Forefront may recommend the use of StoneCastle Cash Management, LLC (SCCM), a service offered by StoneCastle Network, LLC. The cash balance in an SCCM account will be swept from the brokerage account to a deposit account at one or more third-party banks that have agreed to accept deposits from customers of SCCM.

Financial Planning Services

We provide financial planning services on topics based on client suitability such as, but not limited to, retirement planning, risk management, college savings, cash flow, debt management, employee benefits, and estate and incapacity planning.

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 distribution 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 affect and are affected 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.

Description of Individual Financial Planning Services:

- **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 online high-yield savings accounts) 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 children or 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 your business employee benefits needs like group health, life, and disability insurance plans, and your business and personal retirement goals like individual and group 401(k) plans, IRA options, and the like.
- **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 coordinate the creation of your estate plan for you via our partnership with EncoreEstate Plans (details are outlined in "Estate Planning" on page 10) or 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.

FWP and our advisors may recommend specific insurance products for which we may receive commission compensation, and we may sell them to you through our partnership with insurance brokerage general agency, **Forefront Insurance Partners ("FIP")**. As a result, a conflict of interest exists because we have an incentive to recommend products and services through another company we own for which we earn additional compensation in connection with such recommendations. Nonetheless, such recommendations are made only when they are in the best interests of clients, and you are never obligated to do business with our partnership firms. More detailed information on fees and the different ways we may be compensated are discussed in Items 5, 10, and 14 of this brochure.

- **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 and your lifestyle during your retirement years.
- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact 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").

FWP and our advisors may recommend specific insurance products for which we may receive commission compensation, and we may sell them to you through our partnership with insurance brokerage general agency, **Forefront Insurance Partners ("FIP")**. As a result, a conflict of interest exists because we have an incentive to recommend products and services through another company we own for which we earn additional compensation in connection with such recommendations. Nonetheless, such recommendations are made only when they are in the best interests of clients, and you are never obligated to do business with our partnership firms. More detailed information on fees and the different ways we may be compensated are discussed in Items 5, 10, and 14 of this brochure.

- **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 impact your situation. We recommend that you consult with a qualified tax professional before initiating any tax planning strategy. We will participate in meetings or phone calls between you and any tax professional you hire with your approval.

FWP and our advisors may refer you to the Certified Public Accountant(s), tax attorneys and licensed tax advisors through our partnership with tax firm, **Forefront Tax Partners ("FTP")**. FWP and our advisors may receive a referral fee or share in the revenue received for tax services provided to you

through FTP. As a result, a conflict of interest exists because we have an incentive to recommend products and services through another company we own for which we earn additional compensation in connection with such recommendations. Nonetheless, such recommendations are made only when they are in the best interests of clients, and you are never obligated to do business with our partnership firms. More detailed information on fees and the different ways we may be compensated are discussed in Items 5, 10, and 14 of this brochure.

- **Divorce Planning:** Advice may include working with both you and your spouse to determine the current value of all assets jointly and individually owned, including business and real estate assets in preparation for the division and separation of them upon your divorce. Advice may also be separately provided to you and your spouse around individual retirement planning, risk management, budget and cash flow management, and any of our other services listed in this brochure as they pertain to your lives post-divorce.

FWP and our advisors may refer you through our partnership with **Your Divorce Made Simple ("YDMS")**. FWP and our advisors may share in the revenue received for divorce planning services provided to you through YDMS. As a result, a conflict of interest exists because we have an incentive to recommend products and services through another company we own for which we earn additional compensation in connection with such recommendations. Nonetheless, such recommendations are made only when they are in the best interests of clients, and you are never obligated to do business with our partnership firms. More detailed information on fees and the different ways we may be compensated are discussed in Items 5, 10, and 14 of this brochure.

Description of Financial Planning Tiers

Foundational Financial Planning Tier

This service is tailored to individuals and families who are newer to their wealth journey, with fewer investable assets and the least level of complexity in their financial planning needs. This service involves identifying the client's objectives and creating clear goals around all financial aspects of their life through the financial planning process and culminates in a comprehensive financial plan. A client purchasing this service will typically use 3-5 of the individual financial planning services detailed above.

The client is able to communicate with FWP advisors on an ongoing basis via meetings, email, text messaging and phone calls. At a minimum annually, the advisor will meet with the client for a detailed review and update on the client's goals and objectives. Additional meetings may be scheduled as needed depending on the client's individual needs and situation, or as requested by the client.

The planner will monitor the plan on an ongoing basis with quarterly check-ins, the annual review meeting, and anytime access through the client's financial planning dashboard. The planner will recommend appropriate changes whenever needed, and ensure the plan is kept up to date.

Builder Financial Planning Tier

This service is tailored to individuals and families with a moderate level of investable assets and a moderate level of complexity in their financial planning needs. This service involves identifying the client's objectives and creating clear goals around all financial aspects of their life through the financial planning process and culminates in a comprehensive financial plan. A client purchasing this service will typically use 5-7 of the individual financial planning services detailed above.

The client is able to communicate with FWP advisors on an ongoing basis via meetings, email, text messaging, and phone calls. At a minimum annually, the advisor will meet with the client for a detailed review and update on the client's goals and objectives. Additional meetings may be scheduled as needed depending on the client's individual needs and situation, or as requested by the client.

The planner will monitor the plan on an ongoing basis with quarterly check-ins, the annual review meeting, and

anytime access through the client's financial planning dashboard. The planner will recommend appropriate changes whenever needed, and ensure the plan is kept up to date.

Legacy Financial Planning Tier

This service is tailored to individuals and families with a high level of investable assets and a high level of complexity in their financial planning needs. This service involves identifying the client's objectives and creating clear goals around all financial aspects of their life through the financial planning process and culminates in a comprehensive financial plan. A client purchasing this service will typically use 7 or more of the individual financial planning services detailed above.

The client is able to communicate with FWP advisors on an ongoing basis via meetings, email, text messaging, and phone calls. At a minimum annually, the advisor will meet with the client for a detailed review and update on the client's goals and objectives. Additional meetings may be scheduled as needed depending on the client's individual needs and situation or as requested by the client.

The planner will monitor the plan on an ongoing basis with quarterly check-ins, the annual review meeting, and anytime access through the client's financial planning dashboard. The planner will recommend appropriate changes whenever needed, and ensure the plan is kept up to date.

Description of Other Financial Planning Tier Features

Financial Dashboard

The financial dashboard is provided through a third-party, cloud-based financial planning software provider called eMoney Advisor. All financial planning tier clients receive access to their own login to this software. The software has a variety of robust financial planning tools, such as the ability to easily add, personalize and track progress toward financial goals, including spending and budgeting tools. Clients can also easily connect all their financial accounts for a consolidated view of their complete financial picture and are provided with unlimited document storage to safely store all their important files and access them from anywhere. On the advisor-facing side, FWP has access to tools for modeling advanced planning scenarios and illustrating various financial projections and simulations.

Monthly Visual Insights Newsletter

On a monthly basis, FWP publishes a monthly visual insights newsletter for all clients using a third-party marketing software vendor called Snappy Kraken. Each newsletter campaign contains a landing page with the newsletter on it, a series of automated emails, and social media posts to promote it. The newsletter covers a wide array of different topics with a specific focus each month. Past monthly newsletter campaign examples include topics such as "What the Future Could Look Like in 2050", "Post-Pandemic Travel", "Creating Better Financial Behaviors", and "Money Lies (We Tell Ourselves)".

Estate Planning

Forefront offers estate planning coordination services to clients in need of basic planning assistance. In order to provide the estate planning coordination services Forefront has contracted with EncorEstate Plans. EncorEstate Plans provides an online platform to help coordinate the creation of estate planning documents based on information provided by the client. Forefront will send the EncorEstate Plans' Questionnaire to its client, which may be completed by the client on paper or online. Once all data is completed, the estate plan will be returned by EncorEstate Plans to the Advisor for delivery to the client. As part of this service Forefront does not provide legal advice or legal services, but only facilitates the creation of estate planning documents based on the information provided by the client and assists the client in making beneficiary changes to implement the estate plan after the legal documents are executed. Clients are encouraged to review the estate planning documents with their attorney, and any estate plan that is not "basic" will be flagged for deeper examination or referral to a local estate planning attorney.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all our clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (approximate investable assets, tax rate, risk tolerance, time horizon, etc.) and is used to construct a client specific plan to aid in the selection of a portfolio.

Wrap Fee Programs

FWP does not participate in any wrap fee programs.

For California Residents: CCR Section 260.235.2 Disclosure

For clients who receive our Financial Planning services, we must state when a conflict exists between the interests of our firm and the interests of our client. The client is under no obligation to act upon our recommendations. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through our firm.

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 contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fee 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.

Investment Management Services

Our standard Investment Management Services fee is based on the market value of the client's assets under management ("AUM") and is calculated as follows:

Account Value (AUM)	Annual Advisory Fee	Annual Advisory Fee When Also Using FeeX
\$0 - \$749,999	1.50%	1.75%
\$750,000 - \$1,499,999	1.35%	1.60%
\$1,500,000 - \$2,999,999	1.20%	1.45%
\$3,000,000 and Above	1.05%	1.30%

The annual fees are negotiable, prorated, and paid in advance on a monthly basis. The advisory fee is a percentage of the assets under management (AUM) and the fee is applied to the account value as of the last day of the previous month. The monthly fee is calculated as a blended rate. For example, the monthly fee for a client not using Pontera with AUM of \$1,000,000 will be calculated as $[(\$749,999 \times 1.10\%) + (\$250,001 \times 0.95\%)] / 12 = \885.42 .

Forefront will charge an Advisory fees are directly debited from client accounts, or the client may choose to pay by check or electronic funds transfer. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 30 calendar days in advance. Upon termination of the account, any unearned fee will be refunded to the Client.

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. Total fees charged by both parties will not exceed 3% of assets under management per year.

Financial Planning Tiers

Foundational	Builder	Legacy
\$4,600/yr+	\$6,600/yr+	\$9,600/yr+
<ul style="list-style-type: none"> • Single taxpayer • W-2 employee • Under \$250k/yr income • Best for those very early in their wealth journey or with a low level of complexity. • Married = \$800 additional 	<ul style="list-style-type: none"> • Single or married taxpayer(s) • W-2 employee or self-employed • \$250k/yr - \$500k/year income • Best for those already in the building years of their wealth journey with a medium level of complexity. 	<ul style="list-style-type: none"> • Single or married taxpayer(s) • W-2 employee or self-employed and either near retirement or already retired • Over \$500k/year income or already retired • Best for those looking to craft their legacy strategy with a high level of complexity.

Estate Planning Fees

Clients retaining Forefront for estate planning coordination services will pay a fixed fee to cover the cost of EncorEstate Plans. Fixed fee rates range between \$300 to \$2800. The fee range is dependent upon variables including the specific needs of the client, complexity, and resources required. Fees are negotiable and the final agreed upon fee will be outlined in your Advisory Contract. 100% of the fee is due upfront or they can be paid in two payments with remaining 50% due up front and 50% due after the plan has been delivered. If deed work is requested by Client, these fees will be paid separately by the client.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, 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 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. As a result, a conflict of interest exists because FWP has an incentive to recommend products to clients for which FWP earns compensation in connection with such recommendations. Nonetheless, such recommendations are made only when they are in the best interest of clients.

Educational Seminars and Workshops

We may offer educational seminars and workshops on occasion for clients, prospective clients, and the general public. These services are completely free of charge and do not require that attendees commit to engaging into any sort of contractual agreement, financial or otherwise, with Forefront or any of its related persons.

For California Residents: CCR Section 260.238(j) Disclosure

Please note, lower fees for comparable services may be available from other sources.

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 and portfolio management services to individuals, high net-worth individuals (defined as having a liquid net-worth of \$2MM or \$1MM invested), and corporations or other businesses. We do not have a minimum account size requirement for any investment management services.

ITEM 8

Methods of Analysis, Investment Strategies and Risk of Loss

When clients have us complete an Investment Analysis (described in Item 4 of this brochure) as part of their financial plan, our primary methods of investment analysis are fundamental, and cyclical.

Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Cyclical analysis is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Use of Outside Managers

We may refer clients to third-party investment advisers ("outside managers") as needed. Our analysis of outside managers involves 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.

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.

Risks Associated with Securities

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

- **Commercial Paper** is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.
- **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.

- **Options and other derivatives** carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.
- **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 delisted 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 FWP or the integrity of our management.

Criminal or Civil Actions

FWP and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

FWP and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

On August 8, 2018, Eric Negrón (CRD #5378359) was suspended from all capacities by FINRA for failure to comply with an arbitration award or settlement agreement or to satisfactorily respond to a FINRA request to provide information concerning the status of compliance. Suspension lifted on September 4, 2018.

ITEM 10

Other Financial Industry Activities and Affiliations

Michelle Fuccella (CRD# 308521) is registered, or has an application pending to register, as a registered representative of broker-dealer The Leaders Group, Inc. (CRD# 37157). This creates a potential conflict of interest because this individual has an incentive to sell securities to clients for which they earn compensation in connection with such recommendations. Nonetheless, such recommendations are made only when they are in the best interest of clients.

No FWP contractor is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Eric Negron, Amy Colton, Chad Rixse, and Michelle Fuccella are licensed to sell life and health insurance and may sell life and health insurance products to clients or prospective clients of the firm for which they may receive compensation. This creates a potential conflict of interest because these individuals have an incentive to sell products to clients for which they earn compensation in connection with such recommendations. Nonetheless, such recommendations are made only when they are in the best interest of clients.

During the course of Financial Planning Services, Forefront and our advisors may receive compensation outside of the Financial Planning Fees described in Item 5 because we may refer clients to one or more firms that we have partnerships with, specifically Forefront Insurance Partners, Forefront Tax Partners, and Your

Divorce Made Simple. As a result, a conflict of interest exists because we have an incentive to recommend products and services through other companies we own for which we earn additional compensation in connection with such recommendations. Nonetheless, such recommendations are made only when they are in the best interests of clients, and you are never obligated to do business with our partnership firms.

Prior to selecting other third-party investment advisers, we will ensure that they are properly licensed or reported.

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 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 matters 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 a 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" may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. In an effort to reduce or eliminate certain conflicts of interest involving the firm or

personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

Trading Securities At/Around the Same Time as Client's Securities

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

ITEM 12

Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

Specific broker-dealer and custodian recommendations are made to clients based on their need for such services. We recommend broker-dealers based on the reputation and services provided by the firm.

1. Research and Other Soft-Dollar Benefits

We receive a non-economic benefit from Axos Clearing LLC in the form of the support products and services it makes available to us.

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 and broker-dealer for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer of their choice to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transactions and this may cost clients money over using a lower-cost custodian.

The Custodian and Brokers We Use

FWP recommends that clients use Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer, member SIPC, as the qualified custodian. FWP is independently owned and operated and is not affiliated with Schwab.

Schwab will hold client assets in a brokerage account and buy and sell securities when FWP instructs them to. While FWP recommends that clients use Schwab as custodian broker, clients will decide whether to do so and will open their account with Schwab by entering into an account agreement directly with Schwab. FWP does not open the account for the client, although FWP may assist the client in doing so. Even though the account is maintained at Schwab, FWP can still use other brokers to execute trades for the account as described below (see "Brokerage and custody costs")

Additionally, Forefront offers a cash management services through StoneCastle Cash Management, LLC (SCCM). SCCM is a service offered by an unaffiliated third-party, StoneCastle Network, LLC. An SCCM account is a brokerage account whereby the cash balance is swept from the brokerage account to deposit accounts at one or more third-party banks that have agreed to accept deposits from customers of StoneCastle Cash Management, LLC. Please refer to the applicable disclosures provided separately by StoneCastle Cash Management upon account opening.

Forefront may recommend that clients establish brokerage accounts with Axos Clearing LLC ("Axos Clearing") to maintain custody of clients' assets and to effect trades for their accounts. Forefront is not affiliated with Axos Clearing. For our clients' accounts that Axos Clearing LLC maintains, Axos Clearing LLC generally does not charge you separately for custody services, but may be compensated through trading fees or commissions charged on transactions. We have determined that having Axos Clearing LLC 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, including those listed above (see "Factors Used to Select Custodians and/or Broker-Dealers"). These products or services may assist FWP in managing and administering client accounts, including accounts not maintained at Axos Clearing LLC. Other services made available by Axos Clearing LLC

are intended to help FWP manage and further develop its business enterprise. The benefits received by FWP or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to Axos Clearing LLC. As part of its fiduciary duties to clients, FWP endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by FWP or its related persons in and of itself creates a potential conflict of interest and may indirectly influence FWP's choice of Axos Clearing LLC for custody and brokerage services.

How FWP Selects Brokers/Custodians

FWP seeks to recommend a custodian/broker that will hold client assets and execute transactions on terms that are overall most advantageous when compared with other available providers and their services. FWP considers a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for the account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist FWP in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to FWP and its clients
- Availability of other products and services that benefit FWP, as discussed below (see "Products and services available to FWP from Schwab")

Products And Services Available To FWP From Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like FWP. Schwab provides FWP and its clients 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 FWP manage or administer clients' accounts, while others help FWP manage and grow its business. Schwab's support services are generally available on an unsolicited basis (FWP does not have to request them) and at no charge to FWP.

The following is a more detailed description of Schwab's support services:

Services that benefit clients

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 FWP 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 clients and their accounts.

Services that may not directly benefit the client

Schwab also makes available to FWP other products and services that benefit FWP but may not directly benefit clients and their accounts. These products and services assist FWP in managing and administering clients' accounts. They include investment research, both Schwab's own and that of third parties. FWP 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:

- 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
- Provide pricing and other market data
- Facilitate payment of FWP fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services that generally only benefit the firm

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession

Your Brokerage and Custody Costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services, but may be compensated through trading fees or commissions charged on transactions. We have determined that having Schwab 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, including those listed above (see "Factors Used to Select Custodians and/or Broker-Dealers").

Aggregating (Block) Trading for Multiple Client Accounts

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportional to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

ITEM 13

Review of Accounts

Client accounts with discretionary assets under management will be reviewed regularly on no less than an annual basis by Chad Rixse, 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 drawdown, volatility in performance, or buy and sell decisions from the firm or per client's needs.

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

FWP will not provide written reports to Investment Management clients. We may provide written reports to clients as needed, and will provide a comprehensive financial plan to clients participating in either tier offerings. However, we will not provide separate reports for investment accounts other than the client's monthly statement delivered by the custodian.

ITEM 14

Client Referrals and Other Compensation

During the course of Financial Planning Services, Forefront and our advisors may receive compensation outside of the Financial Planning Fees described in Item 5 because we may refer clients to one or more of our partnership firms Forefront Insurance Partners, Forefront Tax Partners, and Your Divorce Made Simple. As a result, a conflict of interest exists because we have an incentive to recommend products and services through other companies we own for which we earn additional compensation in connection with such recommendations. Nonetheless, such recommendations are made only when they are in the best interests of clients, and you are never obligated to do business with our partnership firms.

We receive a non-economic benefit from Axos Clearing LLC 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 Axos Clearing LLC. 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 Axos Clearing LLC's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Forefront may recommend that clients use the services of StoneCastle Cash Management, LLC ("SCCM"). SCCM is a subsidiary of StoneCastle Partners, LLC, a privately held company. In the event that these third-party services are provided to clients, the client will pay all related fees directly to the third party. Forefront and its management persons are compensated directly by SCCM when clients of Forefront utilize their services. Forefront will not share client information with SCCM unless authorized by the client. Clients are not obligated, contractually or otherwise, to use the services of any third party.

ITEM 15

Custody

FWP does not accept custody of client funds except in the instance of withdrawing client fees.

For client accounts in which FWP directly debits their advisory fee:

- I. FWP will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
- II. The custodian will send at least monthly statements to the client showing all disbursements for the account, including the amount of the advisory fee.
- III. The client will prove written authorization to FWP, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least monthly statements from the broker dealer, bank or other qualified custodian that holds and maintains clients' investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

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. Clients may limit our discretion by imposing reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

ITEM 17

Voting Client Securities

We do 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 or more in advance.

ITEM 19

Requirements for State-Registered Advisers

Principal Executive Officers and Management Persons

Please see the attached Form ADV Part 2B – Brochure Supplement for details.

Performance Based Fees

FWP is not compensated by performance-based fees.

Material Disciplinary Disclosures

On August 8, 2018, Eric Negrón (CRD# 5378359) was suspended from all activities for failure to comply with an arbitration award or settlement agreement or to satisfactorily respond to a FINRA request to provide information concerning the status of compliance. Suspension was lifted on September 4, 2018.

Material Relationships That Management Persons Have With Issuers of Securities

No management person at Forefront has any relationship or arrangement with issuers of securities.

Additional Compensation

No management person at Forefront receives any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through FWP.

Supervision

Chad Rixse, as Chief Compliance Officer of FWP, is responsible for supervision. He may be contacted by phone at (512) 553-0885 or by email at chad@forefrontwp.com.

Requirements for State Registered Advisers

Eric Negrón has been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative, proceeding, or a bankruptcy petition.

Chad Rixse has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

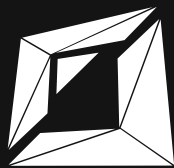
Amy Colton has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

James Karamourtopoulos has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

Michelle Fuccella has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

Chris Marrone has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

Disclosure of Material Conflicts All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding FWP, its representatives or any of its contractors, which could be reasonably expected to impair the rendering of unbiased and objective advice.



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Form ADV Part 2B

BROCHURE SUPPLEMENT

Eric Negron — Individual CRD# 5378359

Owner, CEO, Exit Planner, Wealth Advisor, Investment Adviser Representative

DATED April 4, 2023

This brochure supplement provides information about Eric Negrón that supplements the Forefront (“FWP”) brochure. A copy of that brochure precedes this supplement. Please contact Eric Negrón if the FWP brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Eric Negrón is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 5378359.

ITEM 2

Educational Background and Business Experience

Eric Negron

- Born: 1984

Education Background

- 2008 – 2014: Bachelor of Science, Management, University of Phoenix
- 2002 – 2008: Bachelor of Arts, Finance & Economics, Florida Gulf Coast University

Business Experience

- 08/2021 – Present: Forefront, CEO
- 02/2021 – Present: Forefront Tax Partners, Partner
- 02/2021 – Present: Forefront Insurance Partners, Partner
- 02/2020 – 01/2023: Calton & Associates, Inc. (CRD# 20999), Investment Advisor Representative, Registered Representative
- 05/2019 – 02/2020: IFP Securities, LLC (CRD# 297287), Registered Representative
- 10/2015 – 02/2020: Independent Financial Partners LLC (CRD# 125112), Investment Advisor Representative
- 08/2013 – 08/2018: LPL Financial LLC (CRD# 6413), Investment Advisor Representative, Registered Representative
- 10/2009 – 08/2013: Ameriprise Financial Services Inc. (CRD# 6363), Financial Advisor

ITEM 3

Disciplinary Information

On August 8, 2018, Eric Negrón (CRD# 5378359) was suspended from all activities for failure to comply with an arbitration award or settlement agreement or to satisfactorily respond to a FINRA request to provide information concerning the status of compliance. Suspension was lifted on September 4, 2018.

ITEM 4

Other Business Activities

Eric Negrón is currently employed as a partner and shareholder in Forefront Insurance Partners. This activity accounts for approximately 5% of his time. The commissions and profits Mr. Negrón receives from Forefront Insurance Partners constitute a conflict of interest because he is directly incentivized to sell products and services through Forefront Insurance Partners for which he is compensated for such recommendations. Nonetheless, such recommendations are made only when they are in the best interests of clients.

Eric Negrón is currently employed as a partner, shareholder, and tax preparer at Forefront Tax Partners. This activity accounts for approximately 5% of his time. The wages and profits Mr. Negrón receives from Forefront Tax Partners constitute a conflict of interest because he is directly incentivized to sell the services of Forefront Tax Partners for which he is compensated for such recommendations. Nonetheless, such recommendations are made only when they are in the best interests of clients.

Eric Negrón is currently employed as a partner, shareholder, and tax preparer at Your Divorce Made Simple. This activity accounts for approximately 5% of his time. The wages and profits Mr. Negrón receives from Your Divorce Made Simple constitute a conflict of interest because he is directly incentivized to sell the services of Your Divorce Made Simple for which he is compensated for such recommendations. Nonetheless, such recommendations are made only when they are in the best interests of clients.

ITEM 5

Additional Compensation

Eric Negrón does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through FWP.

ITEM 6

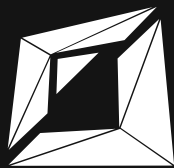
Supervision

Chad Rixse, as Chief Compliance Officer of FWP, is responsible for the supervision and actions of Eric Negrón. Mr. Rixse may be contacted by phone at (512) 617-1984 or by email at chad@forefrontwp.com.

ITEM 7

Requirements for State Registered Advisers

Eric Negrón has no events to list in addition to those listed in Item 3, and he has never been the subject of a bankruptcy petition.



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Form ADV Part 2B

BROCHURE SUPPLEMENT

Chad Rixse — Individual CRD# 6427741

CCO, Director of Financial Planning, Investment Adviser Representative

DATED April 4, 2023

This brochure supplement provides information about Chad Rixse that supplements the Forefront ("FWP") brochure. A copy of that brochure precedes this supplement. Please contact Chad Rixse if the FWP brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Chad Rixse is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 6427741.

ITEM 2

Educational Background and Business Experience

Chad Rixse

- Born: 1989

Education Background

- 2013: Bachelor of Arts, Spanish, University of Washington

Business Experience

- 08/2021 – Present: Forefront, Investment Advisor Representative
- 02/2021 – Present: Forefront Insurance Partners, Partner
- 02/2021 – Present: Forefront Tax Partners, Partner
- 05/2020 – 01/2023: Calton & Associates, Inc. (CRD# 20999), Investment Advisor Representative
- 04/2019 – 04/2020, Independent Financial Partners LLC (CRD# 297287), Investment Advisor Representative
- 12/2018 – 04/2019: Far North Capital LLC (CRD# 6427741), Owner, CCO, Investment Advisor Representative
- 09/2017 – 11/2018: Millennial Wealth, LLC, Co-Founder, CCO, Investment Advisor Representative
- 11/2014 – 08/2017: Wells Fargo Advisors, LLC, Investment Advisor Representative, Registered Representative

Professional Designations, Licensing & Exams

Chartered Retirement Plans Specialist (CRPS®). This professional designation is issued by the College for Financial Planning. It has no prerequisites, involves a self-study course followed by a final designation exam, and requires 16 hours of continuing education every two years. For more information, please visit

<https://www.finra.org/investors/professional-designations/crps>.

ITEM 3

Disciplinary Information

Chad Rixse has never 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

Chad Rixse is currently employed as a partner and shareholder in Forefront Insurance Partners. This activity accounts for approximately 5% of their time. The commissions and profits Mr. Rixse received from Forefront Insurance Partners constitute a conflict of interest because he is directly incentivized to sell products and services through Forefront Insurance Partners for which he is compensated for such recommendations. Nonetheless, such recommendations are made only when they are in the best interests of clients.

Chad Rixse is currently employed as a partner, shareholder, and tax preparer at Forefront Tax Partners. This activity accounts for approximately 5% of their time. The wages and profits Mr. Rixse receives from Forefront Tax Partners constitute a conflict of interest because he is directly incentivized to sell the services of Forefront Tax Partners for which he is compensated for such recommendations. Nonetheless, such recommendations are made only when they are in the best interests of clients.

ITEM 5

Additional Compensation

Chad Rixse does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through FWP.

ITEM 6

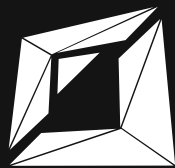
Supervision

Chad Rixse, as Chief Compliance Officer of FWP, is responsible for the supervision and actions of Chad Rixse. Mr. Rixse may be contacted by phone at (512) 617-1984 or by email at chad@forefrontwp.com.

ITEM 7

Requirements for State Registered Advisers

Chad Rixse has no events to list in addition to those listed in Item 3, and he has never been the subject of a bankruptcy petition.



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Form ADV Part 2B

BROCHURE SUPPLEMENT

Amy Colton — Individual CRD# 5966664

Managing Director of Empowered Women, Investment Adviser Representative

DATED April 4, 2023

This brochure supplement provides information about Amy Colton that supplements the Forefront ("FWP") brochure. A copy of that brochure precedes this supplement. Please contact Amy Colton if the FWP brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Amy Colton is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 5966664.

ITEM 2

Educational Background and Business Experience

Amy Colton

- Born: 1952

Education Background

- 1976: Master's in Business Administration, Michigan State University
- 1974: Bachelor of Arts, University of Michigan

Business Experience

- 08/2021 – Present: Forefront, Partner
- 02/2021 – Present: Forefront Insurance Partners, Partner
- 08/2020 – Present: Your Divorce Made Simple, Managing Director
- 03/2023 – Present: Calton & Associates, Inc. (CRD # 20999), Registered Representative
- 05/2020 – 01/2023: Calton & Associates, Inc. (CRD # 20999), Investment Advisor Representative, Registered Representative
- 05/2019 – 05/2020: IFP Securities LLC (CRD# 297287), Registered Representative
- 10/2015 – 05/2020: Independent Financial Partners LLC (CRD# 125112, Investment Advisor Representative
- 05/2014 – 05/2019: LPL Financial LLC (CRD# 6413), Registered Representative
- 05/2014 – 09/2016: LPL Financial LLC (CRD# 6413), Investment Advisor Representative

Professional Designations, Licensing & Exams

Certified Divorce Financial Analyst (CDFA®). This professional designation is issued by the Institute for Divorce Financial Analysts (IDFA). Prerequisites are at least 3 years of industry experience and a Bachelor's degree. The program involves a self-study course followed by a final designation exam, and requires 15 hours of divorce-related continuing education every two years to maintain the designation. For more information, please visit <https://institutedfa.com/cdfa-certification-requirement/>.

ITEM 3

Disciplinary Information

Disclosures for Amy Colton may be found by searching the individual CRD number (5966664) on <https://adviserinfo.sec.gov/>.

ITEM 4

Other Business Activities

Amy Colton is currently employed as a partner and shareholder in Forefront Insurance Partners. This activity accounts for approximately 5% of their time. The commissions and profits Ms. Colton receives from Forefront Insurance Partners constitute a conflict of interest because she is directly incentivized to sell products and services through Forefront Insurance Partners for which she is compensated for such recommendations. Nonetheless, such recommendations are made only when they are in the best interests of clients.

Amy Colton is currently employed as a partner, shareholder, and tax preparer at Your Divorce Made Simple. This activity accounts for approximately 30% of their time. The wages and profits Ms. Colton receives from Your Divorce Made Simple constitute a conflict of interest because she is directly incentivized to sell the services of Your Divorce Made Simple for which she is compensated for such recommendations. Nonetheless, such recommendations are made only when they are in the best interests of clients.

Amy Colton is licensed as a real estate agent in the state of Texas. This activity accounts for approximately 5% of Ms. Colton's time. This creates a potential conflict of interest because Ms. Colton has an incentive to sell real estate to clients for which Ms. Colton earns compensation in connection with such recommendations. Nonetheless, such recommendations are made only when they are in the best interest of clients.

ITEM 5

Additional Compensation

Amy Colton does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through FWP.

ITEM 6

Supervision

Chad Rixse, as Chief Compliance Officer of FWP, is responsible for the supervision and actions of Amy Colton. Mr. Rixse may be contacted by phone at (512) 617-1984 or by email at chad@forefrontwp.com.

ITEM 7

Requirements for State Registered Advisers

Amy Colton has no events to list in addition to those listed in Item 3, and she has never been the subject of a bankruptcy petition.



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Form ADV Part 2B

BROCHURE SUPPLEMENT

Michelle D. Fuccella — Individual CRD# 7001060

Investment Adviser Representative, Registered Representative

DATED April 4, 2023

This brochure supplement provides information about Michelle D. Fuccella that supplements the Forefront (“FWP”) brochure. A copy of that brochure precedes this supplement. Please contact Chad Rixse if the FWP brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Michelle D. Fuccella is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 7001060.

ITEM 2

Educational Background and Business Experience

Michelle D. Fuccella

- Born: 1990

Education Background

- 2012: Bachelors, Sacred Heart University

Business Experience

- 11/2022 – Present: Forefront, Investment Advisor Representative
- 06/2022 – Present: Forefront Insurance Partners, Admin Manager
- 06/2022 – Present: The Leaders Group Inc., Investment Advisor Representative, Registered Representative
- 10/2018 – 06/2022: New York Life Securities, LLC, Investment Advisor Representative, Registered Representative
- 08/2018 – 06/2022: New York Life Insurance Co., Agent
- 04/2006 – 08/2018: Hudson Retina, Ophthalmic Technician

Licensing & Exams

Series 65 - Uniform Investment Adviser Law Examination

ITEM 3

Disciplinary Information

Michelle D. Fuccella has never 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

Michelle D. Fuccella is currently employed as an admin manager at Forefront Insurance Partners. Ms. Fuccella spends approximately 30 hours per month engaged in this activity.

Michelle D. Fuccella is currently employed as a registered representative at The Leader's Group (CRD# 37157). Ms. Fuccella spends approximately 10 hours per week engaged in this activity.

ITEM 5

Additional Compensation

Michelle D. Fuccella does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through FWP.

ITEM 6

Supervision

Chad Rixse, as Chief Compliance Officer of FWP, is responsible for the supervision and actions of Michelle D. Fuccella. Mr. Rixse may be contacted by phone at (512) 617-1984 or by email at chad@forefrontwp.com.

ITEM 7

Requirements for State Registered Advisers

Michelle D. Fuccella has no events to list in addition to those listed in Item 3, and he has never been the subject of a bankruptcy petition.



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Form ADV Part 2B

BROCHURE SUPPLEMENT

James Karamourtopoulos — Individual CRD# 6899394

Investment Adviser Representative, Registered Representative

DATED April 4, 2023

This brochure supplement provides information about James Karamourtopoulos that supplements the Forefront ("FWP") brochure. A copy of that brochure precedes this supplement. Please contact Chad Rixse if the FWP brochure is not included with this supplement or if you have any questions about the contents of this supplement. Additional information about James Karamourtopoulos is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 3147756.

ITEM 2

Educational Background and Business Experience

James Karamourtopoulos

- Born: 1990

Education Background

- 2012: Bachelors of Business Administration, University of Massachusetts Amherst
- 2018: Master of Business Administration, Boston University

Business Experience

- 11/2022– Present: Forefront, Investment Advisor Representative
- 11/2020 – 12/2022: Hereford Financial, Owner & CCO
- 01/2022 – 06/2022: Origin Financial, Financial Planner
- 05/2021 – 09/2021: FP Alpha, Advisor Consultant
- 01/2021 – 03/2021: Centinel Financial Group, Paraplanner
- 10/2019 – 11/2020: Everyday Life, Customer Success Lead
- 10/2017 – 08/2017: GW&K Investment Management, Internal Sales

Professional Designations, Licensing & Exams

CFP (Certified Financial Planner)®: The CERTIFIED FINANCIAL PLANNER, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and Client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real-world circumstances;

- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

ITEM 3

Disciplinary Information

James Karamourtopoulos has never 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

James Karamourtopoulos is not involved with outside business activities.

ITEM 5

Additional Compensation

James Karamourtopoulos does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through FWP.

ITEM 6

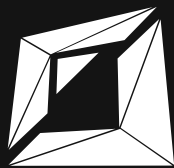
Supervision

Chad Rixse, as Chief Compliance Officer of FWP, is responsible for the supervision and actions of James Karamourtopoulos. Mr. Rixse may be contacted by phone at (512) 617-1984 or by email at chad@forefrontwp.com.

ITEM 7

Requirements for State Registered Advisers

James Karamourtopoulos has no events to list in addition to those listed in Item 3, and he has never been the subject of a bankruptcy petition.



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Form ADV Part 2B

BROCHURE SUPPLEMENT

Chris Marrone — Individual CRD# 6813964

Investment Adviser Representative, Registered Representative

DATED April 4, 2023

This brochure supplement provides information about Chris Marrone that supplements the Forefront ("FWP") brochure. A copy of that brochure precedes this supplement. Please contact Chad Rixse if the FWP brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Chris Marrone is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 6813964.

ITEM 2

Educational Background and Business Experience

Chris Marrone

- Born: 1992

Education Background

- 2017: Actuarial Science, Florida State University

Business Experience

- 10/2022– Present: Forefront, Investment Advisor Representative
- 12/2021 – Present: Origin Financial, Financial Planner
- 11/2021 – Present: Marrone Wealth Management, LLC, Owner & CCO
- 06/2017 – 12/2021: New York Life, Financial Services Professional

Professional Designations, Licensing & Exams

CFP (Certified Financial Planner)®: The CERTIFIED FINANCIAL PLANNER, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and Client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real-world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

ITEM 3

Disciplinary Information

Chris Marrone has never 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

Chris Marrone is the owner of Marrone Wealth Management (CRD# 317011) located in Yonkers, NY. Mr. Marrone spends approximately 40 hours per month as an investment adviser.

Chris Marrone is a financial planner with Origin Financial (CRD# 305353) located in Boston, MA. Mr. Marrone spends approximately 20 hours per month providing this service.

ITEM 5

Additional Compensation

Chris Marrone does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through FWP.

ITEM 6

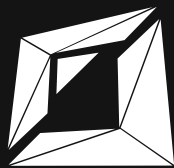
Supervision

Chad Rixse, as Chief Compliance Officer of FWP, is responsible for the supervision and actions of Chris Marrone. Mr. Rixse may be contacted by phone at (512) 617-1984 or by email at chad@forefrontwp.com.

ITEM 7

Requirements for State Registered Advisers

Chris Marrone has no events to list in addition to those listed in Item 3, and he has never been the subject of a bankruptcy petition.



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