Align Financial
Form ADV Part 2A

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This brochure provides information about the qualifications and business practices of Align Financial, LLC. If you have any questions about the contents of this brochure, please contact us at (218) 336-2506. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Align Financial, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Align Financial, LLC is 309238.

Align Financial, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

ITEM 2: MATERIAL CHANGES

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure. Each year, we will ensure that you receive a summary of any material changes to this and subsequent brochures by April 30th. We will further provide you with our most recent brochure at any time at your request, without charge. You may request a brochure by contacting us at (218) 336-2506.

Material Changes Since Last Update

Since our last annual update filing dated February 01, 2024, Align has made the following material changes to this document:

- The Firm became registered with the Securities and Exchange Commission and notice filed in the appropriate states.
- Item 4 and Item 5 were updated to include more detailed descriptions of the wrap fee program and Fidelity's platform provider services offered to current clients.
- The Firm has added updated disclosures regarding unmanaged assets and rollover recommendations to Item 4.
- The Firm no longer offers fee payment options through AdvicePay.
- The Firm has added updated disclosures regarding their custodian services and benefits in Item 12, client referrals in Item 14 and custody in Item 15.
- The Firm does not require nor solicit prepayment of more than $1,200 in fees per client, six months or more in advance.

ITEM 3: TABLE OF CONTENTS

ITEM 4: ADVISORY BUSINESS

Align Financial, LLC (hereinafter called "Align") is a Registered Investment Adviser based in Hermantown, Minnesota, and incorporated under the laws of the State of Minnesota. Align is owned by Tanya Nichols. Align is registered with the Securities Exchange Commission and is subject to its rules and regulations. Align Financial, LLC was founded in March 2017 and became a Registered Investment Adviser in February of 2021. Tanya Nichols has been providing financial advice to clients since 2006. She serves as the Firm's Chief Compliance Officer.

Investment Advisory Services

Align offers the following services to advisory clients, each designed to help you achieve your financial goals:

FINANCIAL PLANNING
Financial Planning is included as part of our investment advisory services. Financial plans and planning services may include but are not limited to retirement income, risk assessment/management, tax and investment planning, estate planning, financial organization, or financial decision making/negotiation. The majority of Align clients receive financial planning services in connection with investment supervisory services.

INVESTMENT MANAGEMENT SERVICES
Align provides ongoing discretionary portfolio management services based on individual goals, objectives, time, horizon, and risk tolerance of each client. Align also performs investment advisory services which may include, but are not limited to, the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, stocks, mutual funds and bonds, annuities, and/or preparing written investment strategies. Align does not allow for clients to place restrictions on the types of investments made in the account(s).

Align will require discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Any portfolio changes are then reviewed at regular review meetings which are conducted at least annually.

USE OF MODEL MANAGERS AND PLATFORM PROVIDERS
The determination to use a particular model or models is based on each client's individual investment goals, objectives and mandates. Our Firm is engaged with Fidelity's platform provider program which offers the following services:

- Model money managers
- Sub advisor/portfolio managers
- Strategists
- Research
- Trade execution services

As part of the platform provider program, Clients provide our Firm and the platform provider discretion to select third party, non-affiliated investment managers ("Model Managers") to design and manage model portfolios.

Align has access to the platform provider's reporting systems, client relationship management systems and workflow systems to assist clients to establish an advisory account. Due to this arrangement, the platform provider will have access to client information, but the platform provider will not serve as an investment advisor to our clients. Align and the platform provider are non-affiliated companies. Clients receive continuous investment advice based on investment objective, risk profile and time-horizon. While investment strategies and recommendations are tailored to the individual needs of each client, they consist of an asset allocation consistent as outlined in Item 8 of this Brochure.

We will not enter into an investment adviser relationship with a prospective client whose investment objectives are considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines. However, Clients have the ability to impose reasonable restrictions on the management of their accounts, including the ability to hold legacy investments or specified cash position.

We do have limited authority to direct the Custodians to deduct our investment advisory fees from accounts, but only with the appropriate written authorization from clients.

Clients may engage us to advise on certain investment products that are not maintained at our Firm's recommended custodian, such as annuity contracts, and assets held in employer sponsored retirement plans. Where appropriate, we provide advice about any type of held away account that is part of a client portfolio.

CLIENT TAILORED SERVICES

Align offers a similar suite of services to all of its clients. However, specific client portfolios and their implementation are dependent upon the clients customized financial plans which outlines each clients current situation(income, tax levels, financial goals and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches the needs and targets of the client.

Align believes that financial planning should be specifically tailored to the unique situation of each client. Prior to creating a financial plan or investment recommendations, clients must provide full disclosure of their financial situation including asset statements, tax returns, estate documents and insurance information. In addition, Align needs a thorough understanding of a clients' financial goals and concerns. Only then can Align offer recommendations on how to best achieve a client's goals.

DISCLOSURE REGARDING ROLLOVER RECOMMENDATIONS

When a client or prospect leaves an employer, they typically have five options regarding their existing retirement plan: (i) leave the money in the former employer's plan, if permitted; (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted; (iii) rollover to a brokerage (self-directed) Individual Retirement Account ("IRA"); (iv) roll over the assets to an advisory IRA; or (v) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). Clients contemplating rolling over retirement funds to an IRA for us to manage are encouraged to first speak with their CPA or tax attorney.

There is an inherent financial incentive for your IAR to recommend that you roll over your assets into one or more accounts, because the enrollment will generate compensation based on the increase in your IAR's total assets under management. We address these financial compensation conflicts by including the disclosure of the conflicts in this brochure and by requiring your IAR to recommend investment advisory programs, investment securities, and services that are in the best interest of each client based upon the client's investment objectives, risk tolerance, financial situation, and cost. As fiduciaries of the Investment Advisers Act of 1940, we have to act in your best interest and not put our interest ahead of yours.

At the same time, the way Align makes money creates some conflicts with your interests. Clients are under no obligation, contractually or otherwise, to complete the rollover. Furthermore, if the client does complete the rollover, the client is under no obligation to have the assets in an account managed by us.

WRAP FEE PROGRAM

Align Financial is the sponsor and manager of Wrap Program (the "Program"), a wrap fee program (i.e., an arrangement where transaction costs are absorbed by the Firm). The fee covers transaction costs resulting from the management of your accounts, however, most investments trade without transaction fees today, so our payment of these and other incidental custodial related expenses should not be considered a significant factor in determining the relative value of our wrap program. However, we have a perceived conflict of interest because we have a financial incentive to maximize our compensation by seeking to reduce or minimize the total costs incurred in your account(s) subject to a wrap fee.

Fidelity generally does not charge commissions or transaction fees for online trades of U.S. exchange-listed equities, U.S. exchange-listed ETFs, and no-transaction-fee ("NTF") mutual funds. This means that, in most cases, when we buy these types of securities, we can do so without paying transaction fees to Fidelity. Additional information about the Program is available in Align Financials' Wrap Brochure, which appears as Part 2A Appendix 1 of the Firm's Form ADV.

ASSETS

As of December 31, 2024 Align has $101,534,280 in discretionary assets under management and $0 in non-discretionary assets under management.

ITEM 5: FEES AND COMPENSATION

A. Fee Schedule

INVESTMENT ADVISORY SERVICES FEES

TOTAL ACCOUNT VALUE	MAX ANNUAL FEE
Under $500,000	1.62%
$500,000 – $1,000,000	1.47%
$1,000,001 – $2,000,000	0.97%
$2,000,001 – $3,000,000	0.87%
$3,000,001 – $5,000,000	0.82%
$5,000,001 or more	0.72%

B. Payment of Investment Advisory Fees

Fees are charged quarterly in advance based on the value of their accounts as of the last business day of the previous quarter. New clients are charged on a pro rata basis, reflecting the actual number of days under management during the quarter.

We charge a fee as compensation for providing Investment Management and Financial Planning services on your account, not to exceed 1.62%. Clients whose assets under management do not reach our portfolio minimum of $1,500,000 will pay a fixed fee of $14,000 a year until which time they meet the minimum portfolio requirement. Our services include financial planning, investment advisory services, trade entry, investment supervision, and other account-maintenance activities. Fee billing methods are defined in the client Investment Advisory Agreement. Although Align has established a maximum annual fee as stated above, we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These factors include the complexity of the client, assets to be placed under management, anticipated future additional assets, related accounts, portfolio style, account composition, reports, among others. The specific annual fee schedule is identified in the contract between the adviser and the client. Fees are assessed on all assets under management, including securities, cash and money market balances. When invested in a managed model there is typically a small percentage invested in cash as part of that model (i.e., 1%). That "cash" will be included in the AUM fee. See Additional Fees and Expenses below for additional details.

USE OF MODEL MANAGERS AND PLATFORM PROVIDERS
The platform provider will not serve as the discretionary investment advisor to our clients. Please note that the fee charged to the client will not increase due to the arrangement that Align has with the platform provider.

At our discretion, we will aggregate asset amounts in accounts from your same household together to determine the advisory fee for all your accounts. We could do this, for example, where we also service accounts on behalf of your minor children, individual and joint accounts for a spouse, and/or other types of related accounts. This consolidation practice is designed to allow you the benefit of an increased asset total, which could potentially cause your account(s) to be assessed a lower advisory fee based on the asset levels available in our fee schedule.

The independent qualified custodian holding your funds and securities will debit your account directly for the advisory fee and pay that fee to us. Written authorization will be required from you authorizing the fees to be paid directly from your account held by the qualified custodian. Further, the qualified custodian agrees to deliver an account statement at least quarterly directly to you indicating all the amounts deducted from the account including our advisory fees. You are encouraged to review your account statements for accuracy.

A client Agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. Upon termination, all fees are charged on a pro rata basis, based on the actual number of days under management during the quarter. Upon termination, you are responsible for monitoring the securities in your account, and we will have no further obligation to act or advise with respect to those assets.

C. Other Additional Fees

ADVISORY FEES IN GENERAL
In addition to the Wrap Fee paid to Align, clients may also incur certain charges imposed by other third parties, trust companies, banks and other financial institutions (collectively "Financial Institutions"). These additional charges may include fees charged by the custodian, margin costs, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, transfer taxes, wire transfer and electronic fund fees, and taxes on brokerage accounts and securities transactions. These fees are not included within the wrap program fee that is charged by the Firm.

MUTUAL FUND FEES

Mutual funds often have multiple share classes with different fees and expenses. At Align, we aim to choose the share class with the lowest fees for you. However, there are times when we might not use the lowest cost share class:

1. **Custodian Limitations**: Sometimes, the custodian holding your account offers a lower-cost share class than other custodians. We will select the lowest cost option available at your custodian, even if a cheaper option exists elsewhere.
2. **Availability Restrictions:** If a custodian offers a lower-cost share class to others but not to us, we will choose the best available option for you. This can happen due to conditions imposed by the custodian that we find unsuitable.
3. **New Share Classes:** Occasionally, a lower-cost share class becomes available after your purchase. We monitor these changes, but there might be a delay before we can switch to the new share class.
4. **Conversion Restrictions:** Sometimes, we can't convert to a lower-cost share class due to restrictions from the custodian or fund sponsor. Additionally, we avoid conversions that would trigger taxable events or other costs that outweigh the benefits.

Our goal is to ensure you get the best value while considering all relevant factors.

NON-TRANSACTION FEE (NTF) MUTUAL FUNDS

When selecting investments for our clients' portfolios we might choose mutual funds on your account custodian's Non-Transaction Fee (NTF) list. This means that your account custodian will not charge a transaction fee or commission associated with the purchase or sale of the mutual fund. The mutual fund companies that choose to participate in your custodian's NTF fund program pay a fee to be included in the NTF program. The fee that a mutual fund company pays to participate in the program is ultimately borne by the owners of the mutual fund including clients of our Firm. When we decide whether to choose a fund from your custodian's NTF list or not, we consider our expected holding period of the fund, the position size and the expense ratio of the fund versus alternative funds. Depending on our analysis and future events, NTF funds might not always be in your best interest.

Neither Align, nor Tanya Nichols receive any outside compensation for the sale of securities to clients. Please refer to Item 12 "Brokerage Practices" of this brochure for additional information.

ITEM 6: PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

Align Financial, LLC does not charge performance-based fees or participate in side-by-side management. Our fees are calculated as described in Fees and Compensation section above and are not charged on the basis of performance of your advisory account.

Side-by-Side Management Fees - refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

Performance-Based Fees - are fees that are based on a share of capital gains or appreciation of the assets of a client.

ITEM 7: TYPES OF CLIENTS

Align generally offers financial planning and investment advisory services to individuals and high net worth individuals.

Align requires a minimum of $1,500,000 of investable assets. This minimum may be waived by the investment adviser based on the needs of the client and the complexity of the situation. Clients who do not reach our portfolio minimum will pay a fixed fee of $14,000 per year until the minimum is reached.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, & RISK OF LOSS

A. Methods of Analysis and Investment Strategies

There are currently some 80,000 different investment options available to individual investors. Align utilizes a number of strategies to identify only those investments that give our clients the highest probability of achieving their financial goals.The strategies employed by Align include fundamental analysis, technical analysis, and cyclical analysis. These methods of analysis are used as part of a long-term, buy and hold strategy based on academic research and historical evidence.

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

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

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

INVESTMENT STRATEGIES
Align uses long term trading and short-term trading. Long-term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can negatively affect investment performance, particularly through increased brokerage and other transaction costs and taxes. As such Align seeks to minimize the number of trades in client accounts.

Short-term trading generally holds greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

Align goes to great lengths to reduce the risk of loss in client accounts. However, investing in securities always involves a risk of loss that you, as a client, should be prepared to bear.

It is important to remember that ALL investments involve a risk of loss. Securities (stocks, bonds, mutual funds, ETFs) can experience substantial losses. Historically speaking, in a well-diversified portfolio, these losses can exceed 20% in any given year.

These losses have historically been temporary, but past performance is no guarantee of future results.

B. Material Risks Involved

No investment is free of risks. Current and prospective Align Financial clients are cautioned that investments in securities involve risk of loss, including the possibility of a complete loss of the amount invested. All investors should be prepared to bear these risks. One of Align Financial's top priorities is to make sure clients understand the investment risks they choose to take and help them select investment strategies that are appropriate for their risk tolerance.

Investors should note that all Align portfolios invest all or a substantial portion of assets in mutual funds and ETFs. Investors are urged to consult the prospectus or other offering documents of each such mutual fund or ETF for additional risks and other considerations.

C. Risks of Specific Securities Utilized

Align generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

Mutual Funds: Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature (explained below).

Equity investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Treasury Inflation Protected/Inflation Linked Bonds: The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

Fixed Income is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

Debt securities carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

Stocks and Exchange TradedFunds (ETF): Investing in stocks and ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

ITEM 9: DISCIPLINARY INFORMATION

Align Financial, LLC nor its Principal Executive Officers have had any reportable disclosable events in the past ten years.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

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

Tanya Nichols, owner and sole IAR of Align, is not currently registered with any broker dealer.

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

Neither Align nor its representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

C. Registration Relationships Material to this Advisory Business

Neither Align nor its representatives have any relationship or arrangement with any outside financial industry related parties.

D. Recommendations or Selections of Other Investment Advisors

Align does not recommend or select other investment advisers for our clients.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS, AND PERSONAL TRADING

A. Code of Ethics

We have a written Code of Ethics which includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect client interests at all times and to demonstrate our commitment to fiduciary duties of honesty, good faith, and fair dealing.

All of Align's Associated Persons are expected to strictly adhere to these guidelines. Persons associated with Align Financial, LLC are also required to report any violations to the Code of Ethics.

Additionally, the firm takes privacy seriously and maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about our clients or client accounts by persons associated with our firm.

The Code of Ethics is designed to safeguard against the violation of the securities laws, and establish procedures for personnel to follow so that we may determine whether their personnel are complying with the Firm's ethical principles.

B. Investing Personal Money in the Same Securities as Clients

Align and the firm's employees may buy or sell securities that are also recommended for clients. We prevent employees from benefiting from transactions placed on behalf of the advisory clients. We recognize the fiduciary responsibility to act in your best interest and have established polices to mitigate conflicts of interest.

C. Recommendations Involving Material Financial Interests

To uphold our fiduciary responsibilities, Align has established the following key policies:

- **No Conflicts of Interest:** Employees must not prioritize personal interests over those of clients. Trades for employees are executed alongside client accounts.
- **Regular Reviews:** We maintain a list of securities held by anyone with access to advisory recommendations, which is regularly reviewed.
- **Client Autonomy:** Clients have the right to decline any advice, unless discretionary authority is granted for their account.
- **Regulatory Compliance:** All employees must comply with relevant Federal and State regulations.
- **Consequences for Non-Compliance:** Employees not adhering to these policies may face termination.
- **Transaction Restrictions:** Employees and associated persons cannot personally trade securities actively recommended to clients, except as per the Firm's procedures.

You may request a complete copy of our Code of Ethics by contacting us at the address, telephone, or email on the cover page of this Part 2; ATTN: Tanya Nichols, Chief Compliance Officer (218) 336-2506.

ITEM 12: BROKERAGE PRACTICES

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

The Custodian, Fidelity Investments ("Fidelity"), was chosen based on their relatively low transaction fees, customer service, transparency, financial strength, reputation, reporting capabilities, types and quality of research and access to a broad selection of investment options. While Align makes every attempt to minimize extra costs, Fidelity may charge their own account maintenance fees. Align and Fidelity are not affiliated companies.

We generally recommend that clients utilize the custody and brokerage services of Fidelity Institutional Wealth Services, ("Fidelity" or the "Custodian") for investment management accounts. Our Custodian is an independent and unaffiliated FINRA-registered broker-dealer. We may recommend that you establish accounts with this custodian to maintain custody of your assets and to affect trades for your accounts. Some of the products, services and other benefits provided by our Custodian benefit us and may not benefit you or your account. Our recommendation/requirement that you place assets with this custodian may be based in part on benefits they provide us, and not solely on the nature, cost or quality of custody and execution services provided by the Custodian.

We are independently owned and operated and not affiliated with any custodian. Fidelity provides us with access to their institutional trading and custody services. These services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors.

In the event you request us to recommend a broker/dealer Custodian for execution and/or custodial services, we generally recommend your account to be maintained at Fidelity. We may recommend that you establish accounts with the Custodian to maintain custody of your assets and to affect trades for your accounts. You have the right to not act upon any recommendations, and if you elect to act upon any recommendations, you have the right to not place the transactions through any broker/dealer we recommend. Our recommendation is generally based on the broker's cost and fees, skills, reputation, dependability and compatibility with the client. We place trades for your account subject to our duty to seek best execution and other fiduciary duties. You may be able to obtain lower commissions and fees from other brokers and the value of products, research and services given to us is not a factor in determining the selection of broker/dealer or the reasonableness of their commissions. Fidelity's execution quality may be different than other broker-dealers.

Many of these services generally may be used to service all or a substantial number of our accounts. The Custodian also makes available to us other services intended to help us manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, the Custodian may make available, arrange and/or pay for these services rendered to us by third parties. The Custodian may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us.

While as a fiduciary, we endeavor to act in your best interest, our recommendation that you maintain your assets in accounts at our recommended Custodian may be based in part on the benefit to us or the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the Custodian, which may create a conflict of interest. IARs endeavor at all times to put the interest of our clients first as a part of their fiduciary duty.

RESEARCH AND OTHER SOFT-DOLLAR BENEFITS

Align receives research, products or other services from its custodian, Fidelity, in connection with client securities transactions. These soft-dollar benefits are consistent with industry standard practices. There is no minimum client number or dollar number that Align must meet in order to receive the free research, products and services from the custodian or broker/dealer.

There is no incentive for Align to direct clients to this particular broker-dealer over other broker-dealers who offer the same services. However, because this firm does not have to produce or pay for certain services or products it has an incentive to choose a custodian that provides those services based on its interest rather than the clients' interest.

The Custodian we utilize makes available to us other products and services that benefit us but may not benefit your accounts in every case. Some of these other products and services assist us in managing and administering your accounts. These include software and technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide portfolio management research & support, pricing information and other market data, facilitate payment of our fees from your account, and assist with back-office functions, record-keeping and reporting.

BROKERAGE FOR CLIENT REFERRALS
Align does not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

TRADE ERRORS
The firm has procedures in place to prevent trade errors, but they cannot always be avoided. In line with our fiduciary duty, we correct errors in a way that prioritizes the client's best interest. If the client causes the error, they are responsible for any resulting loss, and may not receive gains from the correction. If the firm causes the error, the client will be made whole, and the firm will absorb any loss. If the Custodian is at fault, they will cover the costs. Any investment gain from a correction will be donated to charity, and the firm will never profit from trade errors.

CLIENTS DIRECTING WHICH BROKER/DEALER/CUSTODIAN TO USE
We do not routinely recommend, request or require that you direct us to execute transaction through a specified broker dealer. Additionally, we typically do not permit you to direct brokerage. We place trades for your account subject to our duty to seek best execution and other fiduciary duties.

B. Aggregation and Allocation of Transactions

Align has the ability to block trade purchases across multiple accounts, but this does not affect the fees clients pay, as Fidelity does not discount fees for block trades. When Align buys or sells the same security for multiple clients (including personal accounts), they may aggregate these orders into a single block for efficient execution. Each client pays the average price per unit for the transaction.

Align does not receive extra compensation for aggregating trades, and no client is given preferential treatment. If an order is partially filled, it is allocated proportionally based on a pre-determined allocation statement. However, due to the aggregation of orders, some clients may experience higher transaction costs, wider spreads, or less favorable net prices compared to what they would have received if their orders had been executed individually.

ITEM 13: REVIEW OF ACCOUNTS

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

Client accounts are reviewed at least annually by Tanya Nichols, with the assistance of various software programs. Tanya reviews clients' accounts with regards to their investment policies, financial goals and risk tolerance levels. All accounts at Align are assigned to this reviewer.

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

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

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least monthly, from the custodian (Fidelity) a written or electronic report that details the clients' account including assets held and assets value which will come directly from the custodian. By receiving statements directly from Fidelity clients are able to more closely monitor their accounts.

Align will send performance reports on a frequency determined by the relationship with each client. These reports are designed to clearly illustrate the long-term performance of client accounts.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

The Firm receives an economic benefit from Fidelity 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 Fidelity. Clients do not pay more for assets maintained at Fidelity as a result of these arrangements. Client should consider these conflicts of interest when engaging our Firm. The products and services provided by Fidelity, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices).

Align's policy is not to accept or allow our related persons to accept any form of compensation, including cash, sales awards, or other prizes, from a non-client in conjunction with the advisory services we provide to our clients. In addition, Align does not compensate any individual or firm for client referrals. From time to time, we may receive expense reimbursement for travel and/or training expenses from our money managers. Travel expense reimbursements are typically a result of attendance at investment training and education events. While we understand participation in these events can appear as a conflict of interest, we focus any participation on education purposes to better serve our clients.

Align may recommend trusted professionals, such as attorneys or accountants, when needed. We receive no compensation for these referrals, and you are always free to choose any professional you prefer. Similarly, professionals may refer clients to us, and we do not pay for these referrals. As fiduciaries, we are committed to putting your interests first.

ITEM 15: CUSTODY

Align does not have physical custody of any client funds and/or securities and does not take custody of client accounts at any time. Client funds and securities will be held with a bank, broker dealer, or other independent qualified custodian. However, by granting Align written authorization to automatically deduct fees from client accounts, Align is deemed to have limited custody.

You will receive account statements from the independent, qualified custodian holding your funds at least quarterly. The account statement from your custodian will indicate the amount of advisory fees deducted from your account(s) each billing cycle. Clients should carefully review statements received from the custodian.

STANDING LETTERS OF AUTHORIZATION ("SLOA")

Our Firm is deemed to have custody of clients' funds or securities when you have standing authorizations with their custodian to move money from your account to a third-party ("SLOA") and, under that SLOA, it authorizes us to designate the amount or timing of transfers with the custodian. The SEC issued a no-action letter ("Letter") with respect to the Rule 206(4)-2 ("Custody Rule") under the Investment Advisors Act of 1940 ("Advisors Act"). The letter provided guidance on the Custody Rule as well as clarified that an Advisor who has the power to disburse client funds to a third party under a standing letter of instruction ("SLOA") is deemed to have custody. As such, our Firm has adopted the following safeguards in conjunction with our custodians. The firm has elected to meet the SEC's seven conditions to avoid the surprise custody exam, as outlined below:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The client authorizes the investment adviser, in writing or verbally, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization and provides a transfer of funds notice to the client promptly after each transfer.
4. The client has the ability to terminate or change the instruction to the client's qualified custodian.
5. The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
6. The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
7. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

ITEM 16: INVESTMENT DISCRETION

Please refer to the "Advisory Business" section of this Brochure for more information on our discretionary management services.

For those client accounts where Align provides ongoing supervision, the client has given Align written discretionary authority over the client's accounts with respect to the securities to be bought or sold and the amount of the securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides Align discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

ITEM 17: VOTING CLIENT SECURITIES

We do not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

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 any electronic solicitation to vote proxies.

ITEM 18: FINANCIAL INFORMATION

Align does not require nor solicit prepayment of more than $1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, we have not been the subject of a bankruptcy petition at any time.

ITEM 19: PRIVACY POLICY

At Align Financial, LLC, we do everything we can to provide our clients with peace of mind. We have adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility.

Federal law gives consumers the right to limit some but not all sharing of their personal information. This notice will explain how we collect, share, and protect your personal information.

We also know that you expect us to service you in an accurate and efficient manner.To do so, we must collect and maintain certain personal information about you. We know you have entrusted us with your personal information and we are committed to safeguarding that personal information.

A. Categories of Information We Collect

The types of personal information we collect and share depend on the product or service you have with us. We collect certain non-public personal identifying information about you (such as your name, address, social security number, etc.) from information that you provide on applications or other forms as well as communications (electronic, telephone, written, or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

B. Categories of Information We Disclose

We do not sell or share clients' non-public personal identifying information to any non-affiliates so they can market to you. We are permitted by law to disclose nonpublic personal identifying information about you to unaffiliated third parties in certain circumstances.

These circumstances include:

- To service your account or financial plan (such as to broker-dealers, custodians, independent managers, etc.);

- For our own marketing purpose to offer our products and services to you;
- To respond to regulators or law enforcement officers as permitted by other law, or to comply with subpoenas or other legal process;
- To certain back-office service providers such third-party order management, billing, and reporting systems;
- To our attorneys, accountants, and auditors;
- or as otherwise provided by law.

If you are a new client, we can begin sharing your information from the date we sent this notice. If you decide at some point to either terminate our services, or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

C. Confidentiality and Security of Your Information

We restrict access to your non-public personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information. These safeguards are reasonably designed to:

- Ensure the security and confidentiality of customer records and information;
- Protect against unauthorized access to or use of customer records or information that could result in substantial harm or inconvenience to any customer.

D. Opting Out

You may request to opt out of our sharing information with any of the parties listed above by notifying us in writing at info@align.financial.

E. Changes to Our Privacy Policy or Relationship with You

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change to this policy before we implement the change.

If you have any questions or concerns with this notice, or would like to discuss your right to opt out of information sharing, please feel free to contact our office at 218-336-2506.

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