

## Freedom Investment Management, Inc. Form CRS – Client Relationship Summary

Freedom Investment Management, Inc. (“Freedom,” “we,” “our,” or “us”) is an investment advisory firm registered with the Securities and Exchange Commission (“SEC”). Fees for investment advisory and brokerage services differ and it is important for you to understand the difference. Free and simple tools are available so that you can research firms and financial professionals at [www.Investor.gov/CRS](http://www.Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

### What investment services and advice can you provide me?

Freedom offers investment advisory services to retail investors through the registered investment advisory firm (“Financial Advisory Firm”) with which your financial advisor (“Financial Advisor”) is associated. Our services include a technology platform on which is provided comprehensive investment portfolio management services and related operational functions designed to support your Financial Advisor’s efforts to help you achieve your investment objectives.

Some of our services are wrapped together and provided for a simple fee as described below. Depending on the Program chosen, Advisory Fees and Investment Management Fees may be charged separately. You and your Financial Advisor either select from Freedom investment models or have your Financial Advisor build your investment model utilizing Freedom investment tools, investment vehicles and line up of Sub-Advisers. In either case, your Financial Advisor is responsible for gathering and communicating to us your financial information, risk tolerance and investment objectives. All portfolios custom built and managed by your Financial Advisor utilize the investment portfolio offerings on our platform. Your portfolio is invested in one or more exchange traded products (“ETPs”), mutual funds, select third party separate account asset managers (the “Sub-Adviser”), or Freedom (“Freedom Portfolios”). You are limited to selecting the Sub-Advisers and Freedom Portfolios made available on our platform and may not otherwise invest in individual securities. We also provide portfolio management services on a discretionary basis and will create a portfolio of no-load mutual funds and ETFs.

We will accept any type of client our Financial Advisor partners work with, including but not limited to individuals, trusts, retirement plans, businesses and institutions. The minimum account value is \$25,000, which may be adjusted based in certain circumstances. Your assets are safeguarded with one of the qualified custodians with which the Freedom Program is integrated, (the “Custodian”), a registered broker-dealer and member of FINRA and SIPC.

You will receive account statements from the Custodian at least quarterly and monthly performance reports from us. As a part of our services, we review the securities held in your account daily to reconcile with the Custodian’s records. We will regularly monitor your account and may rebalance your portfolio periodically if deemed appropriate. You grant us the discretionary authority to enter trades for your portfolio, taking into consideration your investment objectives and certain restrictions you may impose.



### Ask us the following questions:

- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

*For further information about our services please read Items 4, 5, and 6 of our Wrap Fee Brochure specific to your account based on your selected Program. For a copy of our Wrap Fee Brochures visit [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

### What fees will I pay?

We charge a fee calculated as a percentage of the value of your assets invested in the service (the “Freedom Platform Fee”) that covers the costs of providing the platform, administering the service, certain custody fees and trading. The Freedom Platform Fee is calculated as a percentage of the average daily balance of your account, including cash, and is paid monthly in arrears. The average daily balance of your account is calculated using the closing market value of the account for the days that the securities markets were open for the month. The Freedom Platform Fee you are charged is listed in your Investment Plan and in your monthly performance reports. Depending on the Program chosen, the Freedom Platform Fee may be tiered based on total household assets invested and determined in part by the total assets under management on the Freedom Program through the Financial Advisor. The Financial Advisory Firm charges a separate Advisory Fee which is negotiated between you and the Financial Advisory Firm and is calculated as a percentage of the average daily balance of your account, paid monthly in arrears. You should review your Financial Advisory Firm’s brochure and other disclosure documents for information regarding the fees charged.

In addition, depending on the Program chosen, you may bear Investment Management Fees related to the Sub-Advisers in which your account is invested. Regardless of the Custodian chosen, fees and expenses associated with mutual funds and ETPs in which your account is invested will be borne by you. The Custodian will charge ancillary fees for certain administrative services and for certain additional services including, but not limited to, check writing fees, outgoing transfer fees, annual charges for qualified accounts, special trade charges, and transaction fees assessed by any securities exchange or regulator. *You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand the fees and costs you are paying.*

In order to avoid a potential conflict of interest, generally, we do not charge an Investment Management Fee on Freedom Portfolios. The Investment Management Fees associated with the Freedom Models is the pro-rata aggregated fee of the underlying Sub-Advisers excluding Freedom and our affiliates. More detailed information about our fees and other costs associated with investing, along with applicable conflicts can be found in Item 4 of our Wrap Fee Brochure specific to your account based on your selected Program and Custodian. For a copy of our Wrap Fee Brochures visit for a copy or go to [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



**Ask us the following question:**

- Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

**What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

When we act as your investment adviser, we always act in your best interest and do not put our interest ahead of yours. At the same time, the way we make money may create some potential conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

Some Financial Advisors and/or principals of Financial Advisory Firms own an equity interest in EQIS Holding, Inc., an indirect owner. Although this equity interest does not impact the level of fees that are charged to participate in our services, it may create a conflict of interest because these Financial Advisors and/or principals of Financial Advisory Firms have an overall interest in our business success. Freedom serves as a non-discretionary sub-adviser to an ETF and receives compensation for this service if the assets in the ETF exceed a certain threshold, this creates a conflict of interest with clients as Freedom is incentivized to increase the net assets in the ETF.

*More detailed information about our conflicts of interest can be found in Items 4 and 9 of our Wrap Fee Brochure specific to your account based on your selected Program. For a copy of our Wrap Fee Brochures visit [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

**How do your financial professionals make money?**

Some of our investment professionals are paid an annual salary and bonus based in part on investment performance relative to appropriate benchmarks. Investment advisor representatives are independent contractors and are paid a percentage of the total fees charged to client accounts for which they act as advisor and primary relationship manager. This is a conflict of interest because our financial professionals have an incentive to encourage a retail investor to increase the assets in a retail investor's accounts. We also maintain referral arrangements with independent and unaffiliated Financial Advisory Firms for referring you to us. The Financial Advisory Firm negotiates a fee directly with you for such referral services, which is deducted from your account by the Custodian as directed by Freedom and paid by Freedom to the Financial Advisory Firm.

**Do you or your financial professionals have legal or disciplinary history?**

We have no legal or disciplinary history. Please go to [www.investor.gov/CRS](http://www.investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.



**Ask us the following questions:**

- Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer?
- Who can I talk to if I have concerns about how the person is treating me?

In limited cases we pay the Financial Advisory Firm a portion of the Freedom Program Fee. Reasons for these payments include compensating them for referrals, and subsidizing their costs for compliance and administration of the Freedom Program, and Financial Advisor training and marketing efforts. You should be aware that to the extent that we pay a portion of the Freedom Program Fee to a Financial Advisory Firm, these payments may create a conflict of interest because the Financial Advisory Firm may have an incentive to recommend Freedom over other programs.

**Additional Information**

You can obtain additional information and/or request a copy of this Form CRS by going to [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), by calling us at (800) 949-9936, or by emailing [support@freedomadvisors.com](mailto:support@freedomadvisors.com).