

Form ADV Part 2A

FIRM BROCHURE

Forms ADV Part 2B

BROCHURE SUPPLEMENT

Dated September 1, 2021



FOREFRONT
• WEALTH PARTNERS •

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This Brochure provides information about the qualifications and business practices of Forefront Wealth Partners LLC ("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 Wealth Partners LLC is registered as an Investment Adviser with the State(s) of TX. 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

This is the initial filing for FWP so there are no material changes to report.

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 <http://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 Wealth Partners LLC ("FWP") is registered as an Investment Adviser with the State of TX. We were founded as a standalone Registered Investment Adviser in September 2021. Eric Negron (CRD# 5378359) is the principal owner of FWP. Since FWP is a new entity, the firm currently reports no discretionary or 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., maximum capital appreciation, growth, income, or growth and income), 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.

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 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 wholly-owned subsidiary and insurance brokerage general agent, **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 wholly-owned subsidiaries. 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 wholly-owned subsidiary and insurance brokerage general agent, **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 wholly-owned subsidiaries. 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) and licensed tax advisors at our wholly-owned subsidiary and 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 wholly-owned subsidiaries. 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 to our wholly-owned subsidiary and divorce practice, **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 wholly-owned subsidiaries. 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 Packages

- **Bronze Financial Planning Package**

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, 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 eMoney financial planning dashboard. The planner will recommend appropriate changes whenever needed, and ensure the plan is kept up to date.

- **Silver Financial Planning Package**

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, 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 eMoney financial planning dashboard. The planner will recommend appropriate changes whenever needed, and ensure the plan is kept up to date.

- **Gold Financial Planning Package**

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, 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 eMoney 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 Package Features

- **Financial Dashboard:** The financial dashboard is provided through a third-party, cloud-based financial planning software provider called eMoney Advisor. All financial planning package 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)".

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 offers continuous asset management exclusively through its self-sponsored wrap fee investment program. This program provides account monitoring, rebalancing of funds, performance reporting and other advisory services, as well as trade execution and Internet access to your account for a "wrapped" fee.

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
\$0 - \$749,999	1.10%
\$750,000 - \$1,499,999	0.95%
\$1,500,000 - \$2,999,999	0.80%
\$3,000,000 and Above	0.65%

The annual fees are negotiable, prorated, and paid in arrears 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 with AUM of \$1,000,000 will be calculated as $[(\$749,999 \times 1.10\%) + (\$250,001 \times 0.95\%)] / 12 = \885.42 .

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. Since fees are paid in arrears, no refund will be needed upon termination of the account.

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.

FINANCIAL PLANNING PACKAGES

 BRONZE*	 SILVER*	 GOLD*
Typically \$3,000-\$5,000*/year	Typically \$5,000-\$8,000*/year	Typically Above \$8,000*/year
Typically 3-5 Individual Financial Planning Services	Typically 5-7 Individual Financial Planning Services	Typically 7 or more Individual Financial Planning Services
includes:	includes:	includes:
Initial Financial Plan	Initial Financial Plan	Initial Financial Plan
24/7 Access to Financial Dashboard	24/7 Access to Financial Dashboard	24/7 Access to Financial Dashboard
Anytime Access to Your Advisor	Anytime Access to Your Advisor	Anytime Access to Your Advisor
2x In-Depth Review Meetings Per Year	2x In-Depth Review Meetings Per Year	2x In-Depth Review Meetings Per Year
\$175 credit towards Tax Prep/Planning	3-hrs of FREE Tax Prep/Planning (\$525 value)	3-hrs of FREE Tax Prep/Planning (\$525 value)
Monthly Visual Insights Newsletter	Monthly Visual Insights Newsletter	Monthly Visual Insights Newsletter
*Financial planning pricing tiers show base pricing only. Your final fee will be based on the complexity of your financial picture.	\$250 Discount on a Business Valuation	FREE Business Valuation (\$1k Value)

Fees for financial planning packages are paid either quarterly or monthly, in arrears, by electronic funds transfer. Clients may terminate packages with 30 days written notice. Since fees are paid in arrears, no refunds will be due upon termination.

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 Wealth Partners or any of its related persons.

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, cyclical, and charting analysis.

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.

Charting analysis involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends. Charts may not accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

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 Negron (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

Eric Negron (CRD# 5378359), Amy Colton (CRD# 5966664), and Kenneth Main (CRD# 3147756) each are registered, or have an application pending to register, as a registered representative of broker-dealer Calton & Associates, Inc. (CRD# 20999). This creates a potential conflict of interest because these individuals have 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 employee 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 Kenneth Main 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 Wealth Partners 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 wholly-owned subsidiaries 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 wholly-owned subsidiaries.

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 14 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. We will not trade non-mutual fund securities 5 days prior to the same security for 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 currently do not receive soft dollar benefits.

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 uses Axos Clearing LLC (CRD# 117176) for custody and brokerage services. There is no direct link between FWP's use of Axos Clearing LLC and the investment advice it gives to its clients, although FWP receives economic benefits from Axos Clearing LLC that are typically not available to retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving FWP participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to FWP by third party vendors. Axos Clearing LLC may also have paid for business consulting and professional services

received by FWP's related persons. Some of the products and services made available by Axos Clearing LLC may benefit FWP but may not benefit its client accounts. 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.

FWP recommends Calton & Associates, Inc. (CRD# 20999) for broker-dealer services. There is no direct link between FWP's use of Calton & Associates, Inc. and the investment advice it gives to its clients, although FWP receives economic benefits from Calton & Associates, Inc. that are typically not available to retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving FWP participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to FWP by third party vendors. Calton & Associates, Inc. may also have paid for business consulting and professional services received by FWP's related persons. Some of the products and services made available by Calton & Associates, Inc. may benefit FWP but may not benefit its client accounts. These products or services may assist FWP in managing and administering client accounts, including accounts not maintained at Calton & Associates, Inc.. Other services made available by Calton & Associates, Inc. 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 broker-dealer transactions directed to Calton & Associates, Inc.. 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 Calton & Associates, Inc. for broker-dealer services.

YOUR BROKERAGE AND CUSTODY COSTS

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").

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 package 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 Investment Management Services, Forefront Wealth Partners and our advisors may receive compensation outside of the Investment Management Fees described in Item 5 because we may receive commissions on broker-dealer transactions including, but not limited to, Real Estate Investment Trusts, Regulation D offers, and 1031 real estate exchanges. As a result, a conflict of interest exists because we have an incentive to recommend specific products and services to clients for which we 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 Wealth Partners 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 wholly-owned subsidiaries 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 wholly-owned subsidiaries.

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 Wealth Partners does not compensate any third-parties for referring Investment Management and Financial Planning clients to our firm.

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 Negron (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 Wealth Partners LLC has any relationship or arrangement with issuers of securities.

ADDITIONAL COMPENSATION

No management person at Forefront Wealth Partners LLC 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 (907) 802-5836 or by email at chad@forefrontwp.com.

REQUIREMENTS FOR STATE REGISTERED ADVISERS

Eric Negron 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.

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



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