

Red Reef Advisors LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Red Reef Advisors LLC. If you have any questions about the contents of this brochure, please contact us at (561) 400-3285 or by email at: Jesse.Cordoba@redreefadvisors.com. 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 Red Reef Advisors LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Red Reef Advisors LLC's CRD number is: 174748.

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Registration does not imply a certain level of skill or training.

Version Date: 03/26/2026

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Red Reef Advisors, LLC on 03/24/2025 are described below. Material changes relate to Red Reef Advisors, LLC's policies, practices or conflicts of interests.

March 26, 2026

- **Item 4 - Advisory Business:** Updated assets under management as of December 31, 2025. Added information regarding the selection of outside advisers and managers.
- **Item 5 - Fees and Compensation:** Added information regarding fees for outside advisers and managers.
- **Item 15 - Custody:** Added information about third-party standing letters of authorization.
- **Item 17 - Voting Client Securities:** Updated to reflect that Red Reef Advisors may vote proxies upon client request.

May 26, 2025

- Red Reef Advisors, LLC has transitioned to registration with the United States Securities and Exchange Commission from its prior registration at the state level.

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Item 4: Advisory Business

Red Reef Advisors LLC (hereinafter "Red Reef Advisors") is a Limited Liability Company organized in the State of Florida.

The firm was formed in January 2015, and the principal owner is Red Reef Capital LLC which is controlled by Jesse Cordoba.

Portfolio Management Services

Red Reef Advisors offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Red Reef Advisors creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Red Reef Advisors evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Red Reef Advisors will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is implemented for each client.

To meet its fiduciary obligations, Red Reef Advisors attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Red Reef Advisors' policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Red Reef Advisors' policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Consulting/Monitoring Services

Red Reef Advisors can be retained to provide consulting services for non-discretionary accounts. Consulting services are generally charged a fee based on the percentage of the market value of the assets being monitored or as a fixed fee. Red Reef Advisors seeks to provide consulting services in accordance with the fiduciary duties owed to its accounts and without consideration of Red Reef Advisors' economic, investment or other financial interests.

Financial Planning Services

For some clients, we provide financial planning services under several formats at the client's specific direction. For clients that have at least \$500,000 under our management, we offer comprehensive financial planning, included as part of the annual percentage-based fee for Portfolio Management Services. We will consider waiving the \$500,000 minimum on a case-by-case basis. We also offer financial planning services on a standalone basis.

The financial planning services we provide may be specific or modular in their preparation (unique to each client in their depth of preparation). Topics included as part of the financial planning services may include, but is not necessarily limited to, the following:

- Organization and assessment (Need/Goals Based Planning, Investment Policy creation and review, risk and goal assessment, etc.)
- Retirement and Education planning (current/future budget review and planning, goal setting, account review, etc.)
- Debt management (payment planning, consolidation, fee and rate review, etc.)
- Investments (consolidation, asset allocation, investment selection, etc.)
- Tax planning (cost basis, capital gains and loss review and planning, etc.)
- Estate planning (asset distribution strategy, document review-wills, trusts, POAs, etc.)
- Life events (vacation, travel, family savings etc.)

We will interview and consult with each client to determine the client's personal financial situation and objectives and to analyze the client's financial documentation. As applicable, we then review the client's assets and liabilities, investment portfolio, retirement plan, education plan, risk management plan, risk tolerance, and estate plan, as well as other areas relevant to the client's financial health.

We meet with each client to explain the financial plan and our recommendations. Furthermore, we are available to work with the client throughout the year to implement the plan. As appropriate, the plan is updated to take into account changes in the client's financial situation as well as changes in the investment markets, tax laws, estate planning laws, and so on. The client is ultimately responsible for communicating changes in circumstances to Red Reef Advisors so that we can provide the most accurate advice and counsel possible. Our Wealth Managers are available year-round to assist with the implementation of the plan and to answer any client questions, but the client is ultimately responsible for the implementation or rejection of our recommendations. This means you are never obligated or required to implement our recommendations.

Qualified and ERISA Plan Consulting Services

Red Reef Advisors provides investment advice to plan clients qualified under Sections 401(a), 401(k), 403(b) or 457(b) of the Internal Revenue Code of 1986 and/or subject to the Employee Retirement Income Security Act of 1974 (ERISA) or which are otherwise considered nonqualified.

In providing plan-level investment advice, we may serve as a fiduciary with respect to assets of the Plan as ERISA defines that term under Section 3(21)(A)(ii), offering non-discretionary investment recommendations to the Plan Sponsor, who retains final decision-making authority. Alternatively, we may also serve as a fiduciary as defined by ERISA under Section 3(38), acting as an Investment Manager with full discretionary authority over the selection, monitoring, and replacement of plan investments, subject to proper appointment and acknowledgement of fiduciary status.

Red Reef Advisors may also provide access to asset allocation models over which it exercises discretionary authority and performs ongoing management, including, but not limited to, opportunistic rebalancing. If the plan sponsor elects to include these models within their plan, participants will have the option to direct contributions into the models.

Selection of Outside Advisers and Managers

Red Reef Advisors may select outside Advisers or Managers such as “Separately Managed Account” managers offered to fill a specific investment mandate. Red Reef Advisors will monitor the outside Adviser or Manager’s services, and the outside Adviser or Manager will debit its fee from the client’s account. The fee will be separate from and in addition to Red Reef Advisors’ portfolio management fee.

Services Limited to Specific Types of Investments

Red Reef Advisors generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, hedge funds, private equity funds, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, options, commodities, non-U.S. securities, venture capital funds and private placements. Red Reef Advisors may use other securities as well to help diversify a portfolio when applicable.

Red Reef Advisors offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client’s current situation (income, tax levels, and risk tolerance levels). Clients may not impose restrictions on investing in certain securities or types of securities in accordance with their values or beliefs.

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. Red Reef Advisors does not participate in any wrap fee programs.

Client Assets Managed by Red Reef Advisors total approximately \$ 134,974,430 as of December 31, 2025. \$ 120,296,354 is managed on a discretionary basis and \$ 14,678,076 is managed on a non-discretionary basis.

Item 5: Fees and Compensation

Portfolio Management Fees

Fee schedules are negotiated on a client-by-client basis and are determined based upon a number of factors including, but not limited to, the amount and type of work involved, the size of the portfolios and the resources dedicated to providing the services.

In general, Red Reef Advisors, LLC uses asset management and investment management interchangeably. Standard practice, although from-time-to-time driven by specific client request and needs, is for fees to be charged, is to charge up to a maximum of 2% annually, for our asset management services based on a percentage of assets under management, billed in arrears on a monthly or quarterly basis (upon client's express request, as specified in the IAC). The fee is calculated based on market value of the account as of the last business day of the billing period as reported by the custodian of each account. From time to time the market value of the account may vary from the statement value printed on the custodial statement or invoice due to trailing dividends and/or settling trades. If asset management services are commenced in the middle of the billing period, then the prorated fee for that billing period will be billed in arrears at the end of that billing period. Deposits and withdrawals, cash flow, may also be prorated to reflect days of service provided.

When calculating the fee, it will be rounded to the nearest dollar, the number of cents is always 0. When there are 50 to 99 cents in the pre-rounded fee, we round up. When there are fewer than 50 cents in the pre-rounded fee, we round down. The final fee schedule is attached as Exhibit II of the Investment Advisory Contract. The agreement may be terminated at any time upon 30 days' written notice by either party.

Neither Red Reef Advisors nor its associated persons receive "trailer" or 12b-1 fees from an investment company that the firm recommends. Fees charged by issuers are detailed in prospectuses or product descriptions and clients are encouraged to read these documents before investing.

Consulting/Monitoring Services Fees

Consulting services are generally charged a fee based on the percentage of the market value of the assets being monitored or, instead, as a fixed fee. Fees are on an annual basis, payable monthly or quarterly, in arrears on the market value at the beginning of the month and may vary for each account. Fees will be charged up to a maximum of 2%. At times, due to special circumstances, a client's fee may be different than the fee and schedule listed herein. These fees are generally negotiable, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees for such a plan are determined on a case by case basis, based on the level of expertise and sophistication required to deliver such a plan. Fees charged on a fixed fee basis ranging between \$1,500 and \$50,000 depending on the breadth of services provided, the complexity of the client's situation, and the advisory representatives providing services to the client. The agreement may be terminated at any time upon 30 days' written notice by either party.

Financial Planning for a Fixed or Hourly Fee

At our discretion, we may enter into an engagement with a client to create a one-time, customized financial plan on a fee basis. Such a plan will include topics described in the previous financial planning section as agreed upon by Red Reef Advisors and the client. Fees for such a plan are determined on a case by case basis, based on the level of expertise and sophistication required to deliver such a plan. However, fees are generally charged on a fixed fee basis ranging between \$1,500 and \$15,000 depending on the breadth of services provided, the complexity of the client's situation, and the advisory representative providing services to the client. In addition, Red Reef Advisors may negotiate hourly fees for these services is between \$150 and \$500 per hour. Fees are charged in arrears, payable monthly or quarterly, and are due upon completion.

Prior to commencing financial planning services, the client will be required to enter into an agreement for services. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

Clients may terminate the agreement without penalty for a full refund of Red Reef Advisors' fees within five business days of signing the Financial Planning Agreement.

Qualified and ERISA Plan Consulting Services Fees

Qualified and ERISA Plan Consulting Clients pay one fee to Red Reef Advisors for this service that covers the services provided by Red Reef Advisors and the investment management services provided by Red Reef Advisors. The actual fee charged to each client will be determined with the client and detailed in the agreement for services.

Annual fees are billed to the client on a monthly or quarterly basis. Asset-based fees will be charged up to a maximum of 2%. For asset-based fees, the fee will be calculated monthly or quarterly based on the value of the Plan's assets at the end of each month or quarter. At our discretion, we may enter into an engagement with a client to charge a fixed fee ranging between \$1,500 and \$50,000 annually, as opposed to an asset-based fee. Annual fixed fees are divided into equal monthly or quarterly payments.

Either party (i.e. the client or our Firm) may terminate the agreement for services with 30 days written notice to the other party. A refund of any unearned fees will be made based on the time expended by Red Reef Advisors before termination. A full refund of any fees paid will be made if the agreement is terminated within five business days. When fees are billed in arrears, the client will be responsible for paying the final fee on a pro-rated basis.

Fees for Outside Advisers or Managers

The fees associated with outside Advisers or Managers are billed separately through a separate single or dual contract between the client and the parties concerned. Red Reef charges the client an advisory fee directly to the client. Red Reef fees are separate and distinct from the fees of the SMA manager that may be recommended to clients. A description of these fees and expenses (compensation) are available in each SMA manager's contract that the client is provided and is paid directly to the SMA manager, not Red Reef. Red Reef will always act in the best interests of the client, including when determining which SMA manager to recommend to clients.

The combination of fees for Red Reef Advisors and the third-party managers will not exceed the industry standard of excessive fees, which is 3%.

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly or quarterly basis (upon client's express request, as specified in the Investment Advisory Contract); or may be invoiced and billed directly to the client. Clients may select the method in which they are billed. Fees are paid in arrears.

Payment of Financial Planning Fees

Financial planning fees are paid via check, ACH, and wire in arrears upon completion.

Termination of Services

Either party (i.e. the client or our Firm) may terminate the agreement for services with 30 days written notice to the other party. The client will be responsible for paying the final fee on a pro-rated basis, based on the number of days remaining in the billing period.

Other Fees and Expenses

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Red Reef Advisors. Please see Item 12 of this brochure regarding broker-dealer/custodian.

Neither Red Reef Advisors nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

Red Reef Advisors does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

Red Reef Advisors primarily provides customized investment management services to individuals, high-net-worth individuals, retirement and pension plans, trusts, estates, business entities, charitable foundations and private corporations. Red Reef Advisors' minimum account size is generally \$500,000.

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

Methods of Analysis

Red Reef Advisors' investment process begins with determining the appropriate strategic asset allocation for each client. Asset allocation involves translating the client's circumstances, objectives, and constraints into an appropriate portfolio for achieving the client's goals within the client's tolerance for risk. Asset class targets will be defined by the following asset classes: Equity, Fixed Income, Alternative Investments, and Cash Equivalents. After asset allocation is determined, the next step in our process is to determine the specific investments that will be used to implement the target allocations.

Our methods of analysis include charting analysis, fundamental analysis, technical analysis, cyclical analysis, quantitative analysis, and modern portfolio theory.

Charting analysis involves the use of patterns in performance charts. Red Reef Advisors uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. Technical analysis involves the analysis of past market data; primarily price and volume.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

We obtain information from a number of sources, including financial newspapers and magazines, research materials prepared by third-parties, corporate rating services, annual reports, prospectuses, filings with the SEC and company press releases. We believe these sources of information are reliable and regularly depend on these resources for making our investment decisions; however, we are not responsible for the accuracy or completeness of this information.

Mutual funds and ETFs are generally evaluated based on a variety of factors, including, as applicable and without limitation, portfolio management team philosophy, investment selection process, past adherence to stated process, past performance, internal fee structure, strength and

reputation of fund sponsor, overall ratings for safety and returns, portfolio manager, consistency of performance, and other factors.

Fixed income investments may be used as a strategic investment, as an instrument to fulfill liquidity or income needs in a portfolio, or to add a component of capital preservation. The Adviser may evaluate and select individual bonds or bond funds based on a number of factors including, without limitation, rating, yield and duration.

Investment Strategies

Red Reef Advisors' strategic approach is to invest each portfolio based on the individual needs, goals, objectives and risk tolerance of the client. This means that the following strategies may be used in varying combinations over time for a given client, depending upon the client's individual circumstances:

Long-term trading is the practice of purchasing securities with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Short-term trading is the practice of purchasing securities with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short term price fluctuations.

Short selling involves securities transactions in which an investor sells securities they borrowed in anticipation of a price decline. The investor is then required to return an equal number of shares at some point in the future. A short sale will result in a profit if the security goes down in price.

Margin transactions involve securities transactions in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan.

Options trading involves buying or selling (writing) an option. If you write an option, and the buyer exercises the option, you are obligated to purchase or deliver a specified number of shares at a specified price at the exercise of the option regardless of the market value of the security at expiration of the option. Buying an option gives you the right to purchase or sell a specified number of shares at a specified price until the date of expiration of the option regardless of the market value of the security at expiration of the option.

In general, an asset allocation range will be established with consultation of the client and their needs, then securities and asset classes are selected to meet the client's objectives. Investment selections may include but are not limited to: individual common and preferred stocks, US Treasuries, agency and corporate bonds, municipal bonds, REITs, mutual funds, Exchange Traded Funds, and certificates of deposit. The Portfolio Manager responsible for each client account will construct a portfolio on a client or account level, considering the client's needs and economic circumstances.

Risk of Loss

While Red Reef Advisors seeks to diversify clients' investment portfolios across various asset classes consistent with their objectives in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that client investment portfolios face.

Economic conditions. Changes in economic conditions, including, for example, interest rates, inflation rates, employment conditions, competition, technological developments, political and diplomatic events and trends, and tax laws may adversely affect the business prospects or perceived prospects of companies. While Red Reef Advisors performs due diligence on the companies in whose securities it invests, economic conditions are not within the control of Red Reef Advisors and no assurances can be given that Red Reef Advisors will anticipate adverse developments.

Risks of Investments in Mutual Funds, ETFs, Closed-End Funds and Other Investment Pools.

As described above, Red Reef Advisors may invest client portfolios in mutual funds, ETFs, closed-end funds, and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940, as amended.

Equity Market Risks. Red Reef Advisors may invest portions of client assets directly into equity investments, primarily stocks, or into pooled investment funds that invest in the stock market. As noted above, while pooled investment funds have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

Fixed Income Risks. Red Reef Advisors may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

REIT Risks. Red Reef Advisors may invest portions of client assets into REITs that are publicly traded corporations or trusts that invest in, and/or operate, residential or commercial real estate. REITs are susceptible to the risks associated with direct ownership of real estate, such as the following: declines in property values; increases in property taxes, operating expenses, interest rates or competition; overbuilding; zoning changes; and losses from casualty or condemnation.

Short Sales Risks. Red Reef Advisors, on behalf of its clients, may from time to time sell securities short in anticipation of the realization of a gain if the securities sold short should decline in market value. A short sale is affected by selling a security that the client does not own, or selling a security which the client owns but which it does not deliver upon consummation of the sale. In order to make delivery to the buyer of a security sold short, the client must borrow the security. In so doing, it incurs the obligation to replace that security, whatever its price may be, at the time it is required to deliver it to the lender. The client must also pay to the lender of the security any dividends or interest payable on the security during the borrowing period and may have to pay a premium to borrow the security. This obligation must, unless the client then owns or has the right to obtain, without payment, securities identical to those sold short, be collateralized by a deposit of cash and/or marketable securities with the lender. A short sale of a security involves the risk of a theoretically unlimited increase in the market price of the security, which could result in an inability to cover the short position and a theoretically unlimited loss to the client.

Non-U.S. Securities Risks. Red Reef Advisors may invest portions of client assets directly into foreign investments, or into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

Private Fund Risks. Private investment funds, including private equity funds, hedge funds and venture capital funds, are not suitable for all investors and involve a high degree of risk due to several factors that may contribute to above average gains or significant losses. Such factors include leveraging or other speculative investment practices, commodity trading, complex tax structures, a lack of transparency in the underlying investments, and generally the absence of a secondary market.

Private Placement Risks. Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

Commodity Risks. Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Options Risks. Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Annuities Risks. Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Lack of Diversification. Client accounts may not have a diversified portfolio of investments at any given time, and a substantial loss with respect to any particular investment in an undiversified portfolio will have a substantial negative impact on the aggregate value of the portfolio.

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 a client’s evaluation of the adviser or the integrity of the adviser’s management. Red Reef Advisors has no such disciplinary events to report.

Item 10: Other Financial Industry Activities and Affiliations

Neither Red Reef Advisors nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

Neither Red Reef Advisors nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

Red Reef Advisors receives no additional compensation directly or indirectly from the outside Advisers or Managers it engages to manage portions of client portfolios.

Neither Red Reef Advisors nor its representatives have any material relationships with this advisory business that would present a possible conflict of interest.

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

Red Reef Advisors has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Red Reef Advisors' Code of Ethics is available free upon request to any client or prospective client.

Red Reef Advisors does not recommend that clients buy or sell any security in which a related person to Red Reef Advisors or Red Reef Advisors has a material financial interest.

From time to time, representatives of Red Reef Advisors may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Red Reef Advisors to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Red Reef Advisors will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

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

Item 12: Brokerage Practices

Best Execution and Broker Selection

Custodians/broker-dealers will be recommended based on Red Reef Advisors' duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Red Reef Advisors may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research

conferences and other resources provided by the brokers that may aid in Red Reef Advisors' research efforts. Red Reef Advisors will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Red Reef Advisors recommends Schwab Institutional, a division of Charles Schwab & Co., Inc. and Charles Schwab.

Research and Other Soft-Dollar Benefits

Red Reef Advisors receives no research, product, or services other than execution from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits").

Brokerage for Client Referrals

Red Reef Advisors receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

Clients may direct Red Reef Advisors to use a particular broker for custodial or transaction services on behalf of the client's portfolio. In directed brokerage arrangements, the client is responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, a client who directs brokerage should consider whether such designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to the client. Not all investment advisers allow their clients to direct brokerage.

The arrangement that Red Reef Advisors has with Schwab is designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, the client acknowledges that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that a client chooses to use the brokerage and/or custodial services of alternative service providers may in fact result in a certain degree of delay in executing trades for their account(s) and otherwise adversely affect management of their account(s). By directing Red Reef Advisors to use a specific broker or dealer, clients who are subject to ERISA confirm and agree with the Adviser that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker or dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

Aggregate Trading

If Red Reef Advisors buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Red Reef Advisors would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. Red Reef Advisors would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Reviews of Accounts

All client accounts for which Red Reef Advisors' advisory services are provided on an ongoing basis are reviewed at least annually by the assigned advisor(s), with regard to clients' respective investment policies and risk tolerance levels.

All financial planning accounts are supervised and reviewed upon financial plan creation by the assigned advisor. Each plan is delivered by the Certified Financial Planner assigned to the case and the ongoing monitoring and review is conducted annually by the assigned advisor and supervised by the CCO.

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

With respect to financial plans, Red Reef Advisors' services will generally conclude upon delivery of the financial plan.

Each client of Red Reef Advisors' advisory services will receive a quarterly report detailing the client's account, including assets held, asset value, and fees charged. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

Red Reef Advisors does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Red Reef Advisors clients.

Charles Schwab & Co., Inc. Advisor Services provides Red Reef Advisors with access to Charles Schwab & Co., Inc. Advisor Services' institutional trading and custody services, which are

typically not available to Charles Schwab & Co., Inc. Advisor Services retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Charles Schwab & Co., Inc. Advisor Services. Charles Schwab & Co., Inc. Advisor Services includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For Red Reef Advisors client accounts maintained in its custody, Charles Schwab & Co., Inc. Advisor Services generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Charles Schwab & Co., Inc. Advisor Services or that settle into Charles Schwab & Co., Inc. Advisor Services accounts.

Charles Schwab & Co., Inc. Advisor Services also makes available to Red Reef Advisors other products and services that benefit Red Reef Advisors but may not benefit its clients' accounts. These benefits may include national, regional or Red Reef Advisors specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Advisor Services. Other potential benefits may include occasional business entertainment of personnel of Red Reef Advisors by Charles Schwab & Co., Inc. Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist Red Reef Advisors in managing and administering clients' accounts. These include software and other technology (and related technological training) 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, if applicable), provide research, pricing information and other market data, facilitate payment of Red Reef Advisors' fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of Red Reef Advisors' accounts. Charles Schwab & Co., Inc. Advisor Services also makes available to Red Reef Advisors other services intended to help Red Reef Advisors manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Charles Schwab & Co., Inc. Advisor Services may make available, arrange and/or pay vendors for these types of services rendered to Red Reef Advisors by independent third parties. Charles Schwab & Co., Inc. Advisor Services 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 Red Reef Advisors. Red Reef Advisors is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

Red Reef Advisors does not compensate non-advisory personnel (solicitors) for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, Red Reef Advisors will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Red Reef Advisors is also deemed to have custody of client funds subject to certain third-party standing letters of authorization ("SLOAs") which permit us to transfer money to a third-party subject to the client's standing instruction. With regard to these accounts, Red Reef Advisors has complied with the seven requirements of the SEC's No-Action Letter, dated February 21, 2017, in order to seek relief from the surprise examination requirement of the Custody Rule (Rule 206(4)-2(a)(4) of the Investment Advisers Act of 1940). With the exception of debiting client accounts for advisory fees, and certain third-party SLOAs, Red Reef Advisors does not maintain or accept custody of client funds or securities.

Client funds and securities are maintained at one or more financial institutions that serve as the qualified custodian with respect to such assets. Clients will receive all account statements directly from these qualified custodians, and should carefully review those statements. Red Reef Advisors will send a copy of their invoice to the custodian in addition to sending the invoice to the client as required.

Item 16: Investment Discretion

Red Reef Advisors provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Red Reef Advisors has discretionary authority to determine the broker or dealer to be used. Where investment discretion has been granted, Red Reef Advisors generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

Item 17: Voting Client Securities

Red Reef Advisors generally will not ask for voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

However, upon a client's request, we may agree to vote proxies on that client's behalf. In these cases, we will act in accordance with the client's best interests. In situations where there is a conflict of interest in the voting of proxies due to business or personal relationships that Red Reef Advisors maintains with the persons who have an interest in the outcome of certain votes, we may deny requests from clients to vote such proxies. Clients may obtain a copy of our proxy voting policies and procedures, as well as records of how we voted their proxies, by contacting us at (561) 400-3285 or Jesse.Cordoba@redreefadvisors.com.

Item 18: Financial Information

Red Reef Advisors neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

Neither Red Reef Advisors nor its management has any financial condition that is likely to reasonably impair Red Reef Advisors' ability to meet contractual commitments to clients.

Red Reef Advisors has not been the subject of a bankruptcy petition in the last ten years.