Item 1 – Cover Page

ADV Part 2A Firm Brochure
Ocobter 23, 2026

MCF Advisors, LLC
&
MCF Advisors, LLC d/b/a MCF
MCF Advisors, LLC d/b/a MCF Institutional
MCF Advisors, LLC d/b/a MCF Private Investments

Lexington, KY
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12th Floor
Lexington, KY 40507

This Brochure provides information about the qualifications and business practices of MCF Advisors, LLC, d/b/a MCF, and d/b/a MCF Institutional (collectively herein referred to as "MCF" or "Firm"). If you have any questions about the contents of this Brochure, please contact us at 859-392-8600 and/or tgavin@mcfadvisors.com. Currently, our Brochure may be requested free of charge by contacting Timothy Gavin at 859-392-8600 or tgavin@mcfadvisors.com. Our Brochure is also available on our web site www.mcfadvisors.com free of charge.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about MCF is also available on the SEC's website at: www.adviserinfo.sec.gov. The CRD number for MCF is 130372.

References herein to MCF as a "registered investment adviser" or any reference to being "registered" does not imply a certain level of skill or training.

Item 2 – Material Changes

The purpose of this page is to inform you of material changes since the last annual update to this brochure. If you are receiving this brochure for the first time, this section may not be relevant to you. MCF reviews and updates our brochure at least annually to confirm that it remains current. This Brochure, dated May 28, 2026, contains the following material change(s) from our last annual update, dated March 27, 2026:

Item 12 – Brokerage Practices. Updated to reflect details related to a Client Benefit Agreement MCF entered into with Charles Schwab & Co., Inc. on February 17, 2026.

An other than annual amendment was made on May 28, 2026, updating the following material changes:

Details have been added to include MCF Private Real Estate Fund I LP within **Item 4 – Advisory Business** and **Item 6 - Performance-Based Fees and Side-By-Side Management.**

Item 4 – Advisory Business, Item 5 – Fees and Compensation, Item 10 – Other Financial Industry Activities and Affiliations and Conflicts of Interest, and Item 14 – Client Referrals and Other Compensation have been updated to describe MCF's arrangement, effective September 30, 2026, with WGSH Holdings, LLC d/b/a Vialta and Valo Technologies, LLC.

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Item 4 – Advisory Business

About MCF Advisors, LLC

MCF Advisors, LLC (the "Firm", "we", "us", "our", or "MCF") is an investment adviser registered with the United States Securities and Exchange Commission ("SEC") and is a Limited Liability Company formed under the laws of Kentucky in December 2003. MCF is 100% owned by MCF Financial Holdings, LLC ("Holdings"). Holdings is owned by MCF Legacy Holdings, LLC ("Legacy") and Project Echo Acquisition, LLC ("Echo"). Legacy is owned by MCF employees and management. Echo is indirectly owned by WPCG Select, LLC, an affiliate of Wealth Partners Capital Group, LLC, and Aspire Select Holdings, LP, a subsidiary of HGGC, LLC. MCF has three office locations in the State of Kentucky. MCF also operates under the registered d/b/a MCF Institutional, d/b/a MCF, and d/b/a MCF Private Investments.

Types of Advisory Activities

Wealth Management

MCF's Wealth Management division serves individuals and small business clients by offering financial planning, portfolio management for individuals and/or small businesses, selection of other advisors (including private fund managers), bill-payment services, tax advisory and preparation, personal CFO, and business accounting, consulting and advisory services. MCF generally offers its advisory services through a Comprehensive Wealth Management client experience where financial planning and investment management services are delivered together. Clients may elect to engage MCF for any of its advisory services exclusive of other services.

Financial planning services – MCF provides financial planning services to clients, which can be offered exclusive of investment management. Clients are not required to implement any recommendations made as a result of our financial planning and/or consulting services. The breadth of our services will vary depending on client circumstances.

Portfolio management for individuals and/or small businesses ("Investment Management")– MCF provides investment management services to individuals and/or small businesses. We employ a tactical asset allocation approach to investing.

Selection of other advisors (including *private fund* managers) – On occasion, MCF may select Independent Investment Managers ("Independent Managers") to invest capital in accordance with a client's investment objective. MCF will assist the client with the implementation of the Independent Manager's strategy. For clients who meet certain asset threshold requirements, we offer access to a separately managed account program ("SMA Program"), a fund strategist portfolios program ("FSP Program"), a unified managed account program ("UMA Program"), and other investment vehicles, including private funds/investments, that have certain eligibility requirements. These eligibility requirements may include minimum investment amounts and/or investor accreditation.

MCF has partnered with Tamarac, Inc. ("Tamarac"), a third-party service provider, to make available its managed account platform (the "Envestnet Platform") through its wholly owned affiliate and registered investment advisor Envestnet Asset Management, Inc. ("Envestnet"). Through the Envestnet Platform, MCF can allocate a client's assets among its SMA Program, FSP Program, and UMA Program (collectively, the "Managed Account Programs"). Envestnet facilitates certain operational functions for those clients utilizing a Managed Account

Program(s) offered by Envestnet, including but not limited to fee billing, portfolio reporting, account rebalancing, and trade execution, based on instructions provided by MCF and/or the Independent Manager(s). When providing these services, Envestnet is acting as an agent of MCF. Envestnet charges a tiered platform fee based on assets under management. As assets on the Envestnet platform increase, the fee decreases. There is a minimum annual fee of $50 per account. The Envestnet fees are separate from, and in addition to, MCF's advisory fees, custodial fees and Independent Manager fees. Additional services are available on the UMA platform for an additional fee at the client's request. Additional services include but are not limited to tax overlay and impact overlay. We describe the fees charged for the Managed Account Programs below under Item 5 - Fees and Compensation.

Tax return preparation and filing services – MCF provides tax return preparation services to clients for a separate and additional fee. Services provided are the preparation and filing of individual income tax return (federal, state, and local), trust tax returns, business tax returns, estate tax return, and gift tax returns. MCF also assists with the preparation of estimated tax payment vouchers. **Please Note**: clients are not required to engage MCF for tax services and may choose to work with any tax professional of their choosing.

Accounting and CFO services – These services are offered for a separate and additional fee. Accounting and CFO services may include, but are not limited to bookkeeping, bank account reconciliations, income and expense classification, bill-payment, preparation of adjusting journal entries, and financial statement preparation. The specific scope of services to be provided and manner in which fees are charged by MCF is established in a client's written agreement with MCF.

Estate Planning and Consulting services –MCF employs multiple attorneys to support the needs of MCF clients, though MCF does not hold itself out to be a law firm or provide legal advice. The services these attorneys perform as an employee of MCF is consultative and should not be construed as legal advice. Please see Item 10 for additional information.

As described above, we provide portfolio management services that are tailored to the specific needs of each client. The client may, at any time, impose reasonable restrictions, in writing, on the securities in which they choose to invest.

Business Transition and Value Acceleration Consulting (Third-Party Program)

MCF has entered into a license and joint venture arrangement with WGSH Holdings, LLC d/b/a Vialta ("Vialta") and its affiliate, Valo Technologies, LLC ("Valo"). Neither firm is affiliated with MCF. Through this arrangement, MCF introduces private business owners to value acceleration and transition readiness consulting services delivered by Vialta. MCF also introduces them to the Owner Dependency Index ("ODI") application, a subscription-based software platform owned and operated by Valo.

These services may be presented under MCF's name and branding. However, the consulting services are provided by Vialta, and the ODI application is provided by Valo. Clients who engage these services enter into a separate written agreement directly with Vialta and/or Valo and pay fees directly to those firms. Vialta and Valo, not MCF, are responsible for the consulting services and the application. Certain Vialta and Valo tools use technology, including artificial intelligence, to help generate assessments and draft materials.

In connection with these engagements, MCF serves as the client's primary relationship contact. MCF coordinates the consulting engagement with its financial planning, investment advisory, tax, and estate planning services, and provides ongoing relationship support. MCF does not charge clients a separate fee for this coordination.

Clients are under no obligation to engage Vialta or Valo, and doing so is not a condition of receiving MCF's advisory services. Please see Item 5, Item 10, and Item 14 for information about fees, compensation, and conflicts of interest.

Private Investment Funds

MCF also provides investment advisory services to private investment funds MCF Liminal Investment, LLC and MCF Private Real Estate Fund I LP.

Affiliated Private Investment Funds. MCF provides investment advisory services to private investment funds MCF Liminal Investment, LLC ("Liminal") and MCF Private Real Estate Fund I LP ("PREF I"). Related entity MCF Liminal Manager, LLC ("Liminal Manager"), serves as a general partner to Liminal. Liminal offers securities to investors only through private placements of such securities. Please refer to Liminal's offering documents for information related to the risks, suitability requirements, investment objectives, fee charges and expenses.

PREF I seeks a moderate level of capital appreciation with an emphasis on current income, and looks to generate investment returns by strategically allocating capital to Underlying Funds and other Portfolio Investments (including, but not limited to, special purpose vehicles) invested in diversified value-add real estate and related investments. Please refer to PREF I's offering documents for information related to the risks, suitability requirements, investment objectives, fee charges and expenses.

Unaffiliated Private Investment Funds. MCF also provides investment advice regarding unaffiliated private investment funds. MCF, on a non-discretionary basis, at times, recommends that certain qualified clients consider an investment in unaffiliated private investment funds. MCF's role relative to the private investment funds shall include its initial and ongoing due diligence and investment monitoring services. If a client determines to become a private fund investor, the amount of assets invested in the fund(s) shall be included as part of "assets under management" for purposes of MCF calculating its investment advisory fee. MCF's clients are under absolutely no obligation to consider or make an investment in a private investment fund(s).

Private Fund Risk Factors **–** Private investment funds generally involve various risk factors, including, but not limited to, potential for complete loss of principal, liquidity constraints and lack of transparency, a complete discussion of which is set forth in each fund's offering documents, which will be provided to each client for review and consideration. Unlike liquid investments that a client may own, private investment funds do not provide daily liquidity or pricing. Each prospective client investor will be required to complete a Subscription Agreement, pursuant to which the client shall establish that he/she/it is qualified for investment in the fund and acknowledges and accepts the various risk factors that are associated with such an investment.

Private Fund Valuation – In the event that MCF references private investment funds owned by the client on any supplemental account reports prepared by MCF, the value(s) for all private investment funds owned by the client shall reflect the most recent valuation provided by the fund sponsor. If no subsequent valuation post-purchase is provided by the Fund Sponsor, then the valuation shall reflect the initial purchase price (and/or a value as of a previous date), or the current value(s) (either the initial purchase price and/or the most recent valuation provided by the fund sponsor). If the valuation reflects initial purchase price (and/or a value as of a previous date), the current value(s) (to the extent ascertainable) could be **significantly more or less** than the original purchase price. The client's advisory fee shall be based upon reflected fund value(s).

The Funds offer securities to investors only through private placements of such securities. Please refer to the Funds' offering documents for information related to the risks, suitability requirements, investment objectives, fee charges and expenses for the Fund(s).

MCF Institutional

MCF Institutional provides portfolio management for businesses or institutional clients, portfolio management for individuals and/or small businesses, pension consulting, and selection of other advisors (including private fund managers) services.

Portfolio management for individuals and/or small businesses – We offer risk-based managed asset allocation models to retirement plan participants. Through a separate and additional advisory agreement, plan participants may engage MCF to provide discretionary investment management services to their retirement accounts.

Portfolio management for businesses (other than small businesses) or institutional clients (other than registered investment companies and other pooled investment vehicles) – We provide discretionary money management services to pension plans, endowments, corporations, privately-held businesses, non-profit organizations, and insurance companies.

Pension consulting services – As an ERISA 3(21) or 3(38) investment fiduciary, we work with Plan Sponsors and organizations to design and implement an efficient retirement plan, while providing clarity to Plan Sponsors and organizations on their fiduciary responsibilities, as well as working to increase plan participation, provide participant education, assess participant retirement readiness, and/or investment performance. Our services generally include the development of an Investment Policy Statement ("IPS"), as well as ongoing monitoring and reporting.

We also offer pension consulting services on a limited consulting basis. Under this engagement scenario, the scope of the engagement and our services will be defined under a written agreement. Services offered under this type of engagement may include benchmarking fees and services of incumbent plan service providers, including recordkeepers, third-party administrators, custodians, and investment advisers, best practice review of committee governance documents, and/or review of existing investment alternatives.

Selection of other advisors (including private fund managers) – We may assist Plan Sponsors and organizations in the selection of money managers to invest capital in accordance with their plan IPS. Additionally, we supervise, monitor, and evaluate the selected money managers' investment performance, risk exposure, asset class purity, peer group rankings, and benchmark deviation.

As described above, we provide portfolio management services that are tailored to the specific needs of each client. The client may, at any time, impose reasonable restrictions, in writing, on the securities in which they choose to invest.

MCF does not sponsor or act as a portfolio manager for a wrap fee program.

Assets Under Management

As of 12/31/2025, MCF managed the following assets:

Type	Amount ($)
Discretionary Asset Basis	$ 3,465,332,630

Non-Discretionary Asset Basis	$ 1,219,197,961
Total	**$ 4,684,530,591**

Miscellaneous Additions

Limitations of Financial Planning and Non-Investment Consulting/Implementation Services. To the extent specifically requested by a client to do so, MCF shall generally provide financial planning and related consulting services regarding non-investment related matters, such as estate planning, insurance, etc. MCF **does not** serve as an attorney, and no portion of our services should be construed as same. Accordingly, MCF **does not** prepare estate planning documents. To the extent requested by a client, we may recommend the services of other professionals and/or service providers for certain non-investment implementation purpose (i.e. attorneys, accountants, insurance, etc.), including MCF's representatives in their separate individual capacities as licensed insurance agents, attorneys, etc. MCF employs multiple attorneys to support the needs of MCF clients, though MCF does not hold itself out to be a law firm or provide legal advice. The services these attorneys perform as an employee of MCF is consultative and should not be construed as legal advice. If and when these individuals are engaged to practice law it is through a separate entity, MCF Legal PLLC ("MCF Legal"), and established by a separate written agreement with the client. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from MCF and/or its representatives. **Please Note:** If the client engages any recommended professional and/or service providers, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional and/or service providers. **MCF's Chief Compliance Officer, Timothy Gavin, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest**.

Please Note-Use of Mutual Funds: Most mutual funds are available directly to the public. Thus, a prospective client can obtain many of the mutual funds that might be recommended and/or utilized by MCF independent of engaging MCF as an investment advisor. However, if a prospective client determines to do so, he/she will not receive MCF's initial and ongoing investment advisory services.

Please Note-Retirement Rollovers-Conflict of Interest: When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). In the event MCF recommends that a client roll over their retirement plan assets into an account to be managed by MCF, such a recommendation creates a **conflict of interest** if MCF will earn an advisory fee on the rolled over assets. When acting in such capacity, MCF serves as a fiduciary under the Employee Retirement Income Security Act (ERISA).

There is a **conflict of interest** when an MCF representative makes a recommendation that a participant roll over assets from a retirement account into a new or existing account or investment (e.g. rollover IRA) managed by MCF. The **conflict of interest** exists because MCF will receive compensation (e.g., management fees) if the money is rolled over, but it will not if the recommendation is not accepted.

No client is under any obligation to rollover retirement plan assets to an account managed by MCF. MCF's Chief Compliance Officer, Timothy Gavin remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.

ERISA PLAN ENGAGEMENTS: The Firm may be engaged to provide discretionary investment advisory services to ERISA retirement plans, whereby the Firm shall manage Plan assets consistent with the investment objective designated by the Plan sponsor. In such engagements, the Firm will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 ("ERISA") and referenced in the rollover section above. The Firm will generally provide services on an "assets under management" fee basis per the terms and conditions of an Investment Advisory Agreement between the Plan and the Firm.

Participant Directed Retirement Plans. MCF provides investment advisory and consulting services to participant directed retirement plans per the terms and conditions of a Fiduciary Consulting Agreement between MCF and the plan. For such engagements, MCF shall assist the Plan Sponsor with the selection of an investment platform from which Plan participants shall make their respective investment choices, and, to the extent engaged to do so, also provide corresponding education to assist the participants with their decision-making process. Such engagements present a **conflict of interest** if a plan participant chooses an investment option (asset allocation models) devised and managed by MCF, as more specifically disclosed in the Plan and participant enrollment documents and investment platform/service provider web site. MCF generally earns an additional fee for its asset allocation models. As a result, MCF has an economic incentive to recommend that plan participants utilize MCF models rather than other available non-MCF model plan investment options, thereby presenting a **conflict of interest**.

Please Note-Liquidity Constraints. MCF may utilize mutual funds and/or exchange traded funds that provide for limited liquidity, generally on a quarterly basis. Thus, if we determined that the fund was no longer performing or if you ever determined to transfer your account, the Fund could not be sold or transferred immediately. Rather, sale or transfer would need to await the quarterly permitted sale date. Moreover, the eventual net asset value for the Fund could be substantially different (positive or negative) than the Fund value on the date that the sale was requested. There can be **no assurance** that any such strategy will prove profitable or successful. In light of these enhanced risks/rewards, a client may direct MCF, in writing, not to employ any or all such strategies for the client's account.

Client Obligations. In performing our services, MCF shall not be required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. Moreover,

each client is advised that it remains his/her/its responsibility to promptly notify us if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising our previous recommendations and/or services.

Please Note-Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by MCF) will be profitable or equal any specific performance level(s).

Management of Held Away Assets. MCF has contracted with Pontera to facilitate account aggregation and investment management services for accounts held away from our primary custodial affiliations. The Pontera platform allows us to avoid being considered to have custody of client funds since we do not have direct access to client login credentials to affect trades. A link will be provided to the client allowing them to connect an account(s) to the platform.

MCF has also contracted with Morningstar® ByAllAccounts® ("BAA") to facilitate account aggregation and investment management services for held away assets that may not otherwise be supported by the Pontera platform. When we utilize the BAA software to aggregate client account data, we will be deemed to have custody of your assets, in the event we maintain access to your client login credentials, to affect trades in your held away account.

The client's individual investment strategy for held away assets is tailored to their specific needs and may include some or all of the securities made available through the held away account's custodian. Client portfolios will be designed to meet a particular investment goal, determined to be suitable to the client's circumstances, often in coordination with all the client's assets under management at MCF. Once the appropriate portfolio has been determined, portfolios are continuously and regularly monitored, and if necessary, rebalanced. We are not affiliated with Pontera or BAA in any way and receive no compensation from them for using their platforms.

MCF shall not be responsible for, and it shall remain the client's exclusive obligation to maintain updated login credentials and to notify us of any changes that would impact our ability to discharge our duties. We charge clients a fee for our services as described below within Item 5 Fees and Compensation, Fee Schedule. Clients do not pay any other fees to Pontera or BAA.

Item 5 – Fees and Compensation

MCF receives its compensation through a combination of fixed and asset-based fees. The fee schedule for MCF's services is dependent upon the scope of each client engagement. MCF generally recommends that a client engage MCF for services which meet their individual situation, however clients may choose to engage MCF for the services of their choosing. We retain the option to negotiate fees on an individual basis. Factors considered may include: complexity of the client's situation, assets under management, anticipated future additional assets under management and related accounts, among other factors. The specific manner in which fees are charged by MCF is established in a client's written agreement with MCF. **Please Note**: MCF generally rounds fee amounts to the nearest whole dollar. The respective fees for MCF's services are as follows:

Wealth Management

Financial planning services – The fixed fee for stand-alone planning and consulting services ranges from $200 to $1,000 or more per month, dependent on the breadth of services selected by the client. Fees may be billed monthly, quarterly, or up front, dependent on the scope of the engagement through a fixed fee payment structure.

Fixed fees for financial planning services are typically waived for clients with more than $500,000 of assets under management, however we retain the option to negotiate fees on an individual basis. **Please Note: Grandfathered Fee Schedules.** Many clients have and will continue to be grandfathered under fee schedules and/or agreements that precede the fee schedule set forth at this time. As a result, MCF clients could be subject to various different fee schedules and/or arrangements, including those that may be higher or lower than the fee schedule set forth below. **ANY QUESTIONS**: MCF's Chief Compliance Officer, Timothy A. Gavin remains available to address them.

Portfolio management for individuals and/or small businesses & selection of other advisors (including private fund managers) ("Investment Management") –The asset-based fee schedule for our portfolio management services is outlined in the table below. **Please Note: Grandfathered Fee Schedules.** Many clients, including certain clients who became clients of MCF through an acquisition, have and will continue to be grandfathered under fee schedules and/or agreements that precede the fee schedule set forth at this time. As a result, MCF clients could be subject to various different fee schedules and/or arrangements, including those that may be higher or lower than the fee schedule set forth below. **ANY QUESTIONS**: MCF's Chief Compliance Officer, Timothy A. Gavin remains available to address them.

Fee Schedule**:**

If the market value of the assets under management is less than $500,000.00 on the initial billing date, an annual fee of 125 basis points (1.25%) will apply to all assets under management.

Otherwise, if the market value of the assets under management is greater than or equal to $500,000.00, initially, or anytime thereafter, the following fee schedule will apply:

Client Assets Under Management ("AUM")	**Annual Fee (%)**
On the first $3,000,000	1.00%
On the next $7,000,000	0.50%
On amounts in excess of $10,000,000	0.40%

The fee schedule shall apply to the aggregate amount of the accounts under management. Should the market value of the assets under management decrease below $500,000.00 after a lower rate has been previously applied, MCF will honor the lower rate.

Tax return preparation and filing services – Tax return preparation, filing, and estimated tax payment determination services are generally offered to clients with a minimum of $1,000,000 of assets under management, for a separate and additional fee. Fees are quoted based on the specific engagement, with a minimum fee of $1,000 per engagement. The specific scope of services to be provided and manner in which fees are charged by MCF is established in a client's written agreement with MCF. **Please Note**: clients are not required to engage MCF for tax services and may choose to work with any tax professional of their choosing.

Accounting and CFO services - Fees are quoted based on the scope of the engagement and billed on a fixed fee basis, with a minimum fee of $18,000. Accounting and CFO services may include, but are not limited to bookkeeping, bank account reconciliations, income and expense classification, bill-payment, preparation of adjusting journal entries, and financial statement preparation. The specific scope of services to be provided and manner in which fees are charged by MCF is established in a client's written agreement with MCF.

Private Investment Funds - From time to time, MCF forms and offers interests in closed-end, affiliated private investment funds. For certain qualified investors that make a large commitment, the level of the asset-based management fee may be reduced. In the event the affiliated private investment fund charges a performance-based fee, investors will pay a percentage of profits after a return of contributed capital and a preferred return. Private investment fund investors will also incur additional fund expenses, including, but not limited to administrative, tax, audit, and legal, expenses. Additional information regarding fees can be found in each fund's private placement memorandum and related offering documents.

Performance-based fee arrangements create an incentive for the firm to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. In order to reduce potential conflicts of interest, the firm does not show preferential treatment to accounts under a performance-based fee arrangement.

See Item 10 – Other Financial Industry Activities and Affiliations and Conflicts of Interest for additional information on Conflicts of Interest.

MCF Institutional

Portfolio management for individuals and/or small businesses – MCF charges an annual rate of 0.50%, billed in quarterly installments for its asset allocation models (managed portfolio strategies service).

Portfolio management for businesses (other than small businesses) or institutional *clients* (other than registered investment companies and other pooled investment vehicles) – The fee schedule applicable for MCF Institutional's services are customized to each client's individual situation.

Pension consulting services – The fee schedule applicable for MCF Institutional's services are customized to each client's individual situation.

Selection of other advisors (including *private fund* managers) – The fee schedule applicable for MCF Institutional's services are customized to each client's individual situation.

Clients may elect to be billed directly for fees or to authorize MCF to directly debit fees from client accounts.

MCF's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, 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 funds 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 MCF's fee, and MCF shall not receive any portion of these commissions, fees, and costs.

MCF will generally bill its fees on a quarterly basis in advance. Upon termination of the applicable Investment Advisory Agreement, MCF will refund the pro-rated portion of the advanced advisory fee paid based upon the number of days remaining in the billing quarter.

Miscellaneous Additions

Envestnet Managed Account Programs. As described in Item 4-Advisory Business, through the Envestnet Platform, MCF can allocate a client's assets among Envestnet's Managed Account Programs. Envestnet charges a tiered platform fee based on assets under management of 2 to 10 basis points per account, per year. As assets on the Envestnet platform increase, the fee decreases. There is a minimum annual fee of $50 per account. **The Envestnet fees are separate from, and in addition to, MCF's advisory fees**, custodial fees and Independent Manager fees. Additional services are available on the UMA platform for an additional fee at the client's request. Additional services include but are not limited to tax overlay and impact overlay.

Third-Party Business Consulting and Software Fees. Clients who engage Vialta for consulting services or subscribe to the ODI application pay fees directly to Vialta or Valo under their separate agreement with those firms. These fees are separate from, and in addition to, any advisory fees paid to MCF. Vialta and Valo set their fees in their sole discretion, and MCF does not set or negotiate them.

Please Note-Third-Party Service Providers. MCF utilizes third-party service providers, including algorithmic trading tools and similar commercially available software, to inform our investment advice and/or management of client assets for direct and/or personalized index services. These tools enable us to more efficiently implement client investment strategies. Fees charged by third-party service providers **are separate from, and in addition to, MCF's advisory fees**. The specific fees incurred by a third-party service provider are based on assets subject to the direct and/or personalized index service and are further described within a client's investment advisory agreement.

Endorsements and Client Referrals. MCF may pay third parties for endorsements or client referrals. Such compensation is paid by MCF and does not result in additional charges to clients. Please see Item 14 for additional details.

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

In some case, MCF enters into performance fee arrangements with our private funds. Liminal Manager, LLC charges a performance-based fee for services provided to MCF Liminal Investment, LLC. PREF I is a fund-of-fund and each underlying fund manager may be entitled to receive a performance allocation, performance fee, or carried interest in its capacity as the manager of the underlying fund. Performance fee arrangements may vary in accordance with negotiated fee structures set forth in the applicable limited partnership agreement.

Please Note: The receipt of performance-based fees creates a conflicts of interest. Performance-based fee arrangements create an incentive for the firm to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement.

Item 7 – Types of Clients

MCF provides portfolio management services to individuals, high net worth individuals, trusts, pension and profit-sharing plans, private investment funds, charitable institutions (including foundations), and corporations or other businesses.

MCF generally does not require a minimum account size to open a portfolio. We will match a client's needs to the best service offering and allow the client to choose whether or not to engage MCF.

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

Methods of analysis and investment strategies used in formulating investment advice and/or managing assets. MCF assists each client to identify and tailor their long-term investment objectives to goals that are representative and suitable to their personal situation. We typically execute this by evaluating their current financial condition through the preparation of a financial plan or through an interview process where the client's willingness to take financial risk is assessed. MCF will recommend a diversified investment strategy or asset allocation portfolio design for the client around this assessment. While our portfolio designs are intended to be diversified in order to mitigate investment risks, there is a risk of loss of both income and principal.

Asset allocation does not ensure a profit or guarantee against loss, it is a method to help manage investment risk. Investing in securities involves risk of loss that clients should be prepared to bear.

Material risks involved in MCF's investment strategies/methods of analysis. MCF believes investment success comes from focusing on risk management. Risk management is the process of monitoring certain aspects of the portfolio so that it does not take on more risk than desired. We continually analyze the economic landscape as well as portfolio specific data such as asset class correlations, asset class volatility, beta, downside risk, tracking error, sector exposure, yield, duration, and credit quality, among other criteria. In order to minimize risk in our portfolio designs, MCF feels that asset allocation or the process of diversifying money across different asset classes maximizes return and minimizes risk. In MCF's opinion, no one knows for certain what will be the best and weakest performing asset class in a given year, which is why we have exposure to multiple asset classes in our portfolio designs.

Asset allocation does not ensure a profit or guarantee against loss, it is a method to help manage investment risk. Investing in securities involves risk of loss that clients should be prepared to bear.

Types of investments typically recommended, and material risks involved. In implementing our asset allocation process to a client's portfolio, we may invest in mutual funds, exchange traded funds (or notes), individual equities, and individual fixed income. MCF also provides advice to clients who qualify for private placements, hedge funds, and other alternative investments. In determining the client's long-term investment objectives, we help clients understand the inherent risks involved in investing in capital markets. As with all investment securities, there is a risk of loss of both income and principal. Clients should not assume that any investment will be profitable or achieve any specific performance level.

Please Note: Private investment funds generally involve various risk factors, including, but not limited to, potential for complete loss of principal, liquidity constraints and lack of transparency, a complete discussion of which is set forth in each fund's offering documents, which will be provided to each client for review and consideration. Unlike liquid investments that a client may maintain, private investment funds do not provide daily liquidity or pricing. Each prospective client investor will be required to complete a Subscription Agreement, pursuant to which the client shall establish that he/she is qualified for investment in the fund and acknowledges and accepts the various risk factors that are associated with such an investment. As with all investment securities, there is a risk of loss of both income and principal. Clients should not assume that any investment will be profitable or achieve any specific performance level.

Please Note-Third-Party Service Providers. MCF utilizes third-party service providers, including algorithmic trading tools and similar commercially available software, to inform our investment advice and/or management of client assets for direct and/or personalized index services. These tools enable us to more efficiently implement

client investment strategies.

Asset allocation does not ensure a profit or guarantee against loss, it is a method to help manage investment risk. Investing in securities involves risk of loss that clients should be prepared to bear.

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 MCF or the integrity of MCF's management. MCF has no disciplinary history.

Item 10 – Other Financial Industry Activities and Affiliations and Conflicts of Interest

Licensed Insurance Agents. Certain MCF employees are licensed insurance agents in their individual capacities. **Conflict of Interest**: The recommendation that a client purchase an insurance commission product from an MCF representative in his/her individual capacity as an insurance agent presents a ***conflict of interest***. Clients are reminded that they are free to purchase insurance products recommended by MCF through other, non-affiliated insurance agents.

MCF Legal PLLC. MCF Legal is a law firm owned by certain MCF employee(s) who practice law as an outside business activity. Clients of MCF may be referred to MCF Legal for estate planning and other legal services. Due to the fact that MCF Legal is owned by MCF employee(s), this presents a ***conflict of interest*** as both firms have an economic incentive to refer clients to each other in lieu of referring clients to other law firms or financial professionals. Although we recommend you use the services of MCF Legal, you are never obligated or required to use their services. There are other law firms that provide legal services similar to those provided by MCF Legal and may provide such services for less expensive rates. Whenever we recommend MCF Legal, you are encouraged to consider other law firms too. The services of MCF and MCF Legal are separate and distinct from one another, each with a separate compensation arrangement typical for the services rendered.

Professional Services Referrals. Occasionally, MCF refers clients to other professionals for a variety of services such as accounting, tax, legal or insurance brokerage. Clients, however, are under no obligation to purchase any products through these professionals or to purchase any products recommended by these professionals. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from MCF. If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. The engaged unaffiliated licensed professional(s) (i.e. attorney, accountant, insurance agent, etc.), and not MCF, shall be responsible for the quality and competency of the services provided. Because MCF *could request, and receive,* compensation in the form of a referral fee or a reciprocating referral should a referred client or other individual determine to engage the unaffiliated professional to provide professional services, this presents a ***conflict of interest***, as the recommendation to engage the unaffiliated professional would economically benefit MCF if MCF *requested, and received* a referral fee or referral. MCF will refer other professionals to its clients only when we believe the services provided by the professional best suit the client's needs.

In the event MCF refers a client or other individual to an unaffiliated investment advisory firm and MCF receives compensation in the form of a referral fee, should a referred client or other individual determine to engage the unaffiliated investment advisory firm to provide investment management services, any referral fee received by

MCF shall be included in the advisory fee charged by the unaffiliated investment advisory firm in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended, and any corresponding state securities laws, rules, regulations, or requirements.

Certain MCF employees are licensed insurance agents of Lion Street, Inc., a wholly owned subsidiary of Integrity Marketing Group, Inc and receive compensation related to the placement of certain insurance products as referenced in the paragraphs above. MCF Legacy Holdings, LLC has a negligible indirect ownership interest (less than 0.5%) in Lion Street, Inc.'s parent company, Integrity Marketing Group, Inc. This ownership interest presents a ***conflict of interest***, as the recommendation to purchase insurance products from Lion Street, Inc. would economically benefit MCF.

Vialta and Valo Technologies**.** As described in Item 4, under the agreement with Vialta and Valo, MCF receives the exclusive right to offer their services within certain markets in Kentucky, Ohio, Indiana, Tennessee, and West Virginia, along with program materials and support. MCF receives referral compensation from Vialta and Valo as described in Item 14. This arrangement presents the following conflicts of interest: 1) MCF has a financial incentive to recommend these services in order to earn compensation; and 2) The service is designed in part to introduce business owners to MCF's advisory services. MCF therefore has an incentive to recommend that clients engage Vialta and/or Vialta, and to favor business transition outcomes, such as the sale of a business, that may result in additional assets under MCF's management and additional advisory fees.

MCF Liminal Manager, LLC ("Liminal Manager"). Liminal Manager is an affiliate of MCF, established in March 2025 to serve as Manager to MCF Liminal Investment, LLC, a private investment fund established in October 2025. MCF Financial Holdings, LLC owns 50% of Liminal Manager.

Outside business activities are further described in MCF's Form ADV Part 2B (the "brochure supplement").

MCF Private Trust, a d/b/a of National Advisors Trust Company is an affiliate of National Advisors Trust Company, ("NATC") a national trust company. MCF Private Trust, a d/b/a of National Advisors Trust of South Dakota, Inc. is an affiliate of National Advisors Trust of South Dakota, Inc., ("NATCSD") a South Dakota trust company. NATC and NATCSD were created to support the fiduciary needs of clients who, through their estate planning efforts, prefer to continue to maintain their relationship with their financial advisory firm. NATC and NATCSD are wholly owned subsidiaries of National Advisors Holdings, Inc. ("NAH"). MCF has entered into an agreement with NATC and NATCSD to establish a private label trust solution offered through NATC and NATCSD. Their mission is to support the delivery of trust and custody services to the clients of its shareholders. To support this endeavor, MCF created MCF Private Trust, a d/b/a of National Advisors Trust Company and MCF Private Trust, a d/b/a of National Advisors Trust of South Dakota, Inc. (collectively referred to as "MCF Private Trust"). MCF may recommend MCF Private Trust to its advisory clients seeking trust services. The grantor in a trust agreement would name MCF as the investment manager with discretion to manage the trust estate, and the agreement would also provide that MCF Private Trust discharge the administrative, distribution and custodial responsibilities of the trust.

MCF's Chief Compliance Officer, Timothy Gavin, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

MCF has adopted a Code of Ethics that will apply to all of the Firm's supervised persons and sets forth the

standard of conduct by which each individual should carry out his/her respective obligations. Specifically, this document presents the Firm's fundamental standard of conduct and shall address issues pertaining to:

- Privacy of Client Non-Public Personal Information
- Insider Trading;
- Personal Securities Transactions;
- Receipt of Gifts;
- Political Contributions;
- Outside Business Activities.

All supervised persons at MCF must acknowledge the terms of the Code of Ethics annually, or as amended.

Subject to satisfying this policy and applicable laws, officers, directors and employees of MCF and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for MCF's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of MCF will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of MCF's clients. In addition, the Code requires pre-clearance of some transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between MCF and its clients.

Private Investment Funds. As discussed in previous sections, MCF provides advisory services on certain private investment funds to facilitate client investments in certain offerings that, due to minimum investment size requirements, would not otherwise be accessible to MCF clients. In connection with its private investment funds, MCF owns or controls Liminal Manager which serves as general partner to their respective pooled vehicles.

Liminal Manager has designated MCF primary responsibility for investment management and administrative matters, such as accounting, tax, and periodic reporting. MCF and its directors, officers, and employees will devote as much time as necessary to the Liminal to appropriately manage its objectives. For the services provided to Liminal, MCF will benefit from appreciation on the underlying fund investment to the same extent as Liminal investors up to a point in time that a pre-determined hurdle rate is reached. As mentioned in ***Item 6—Performance-Based Fees and Side-By-Side Management***, MCF will potentially earn performance-based fees once a pre-determined hurdle rate is reached.

MCF is not restricted from forming additional private investment funds, entering into other investment advisory relationships, or engaging in other business activities, even though such activities could be in competition with other affiliated private investment funds and/or involve substantial time and resources of our firm. Such activities could be viewed as creating a conflict of interest, in that the time and effort of our management personnel and employees will not be devoted exclusively to the affiliated private investment funds. Investments in any affiliated private investment fund are only recommended to advisory clients for whom a partnership investment is suitable.

There are no instances where MCF charges its clients a fee on both an AUM basis at the firm level and within a private investment fund vehicle. MCF generally charges a higher fee on assets invested in affiliated private investment funds.

Eligible MCF employees are permitted to invest alongside clients in private investment fund offerings. This

presents a ***conflict of interest.*** In the event an MCF employee exercises their right to liquidate/withdraw funds from a private investment fund where the MCF employee is invested side-by-side with clients, MCF will generally notify clients who are invested alongside the MCF employee of the MCF employee's intent to liquidate/withdraw so the client can make a determination as to whether or not they would also like to liquidate/withdraw funds.

MCF's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting its Chief Compliance Officer, Timothy A. Gavin.

Item 12 – Brokerage Practices

The custodian and brokers we use

MCF does not maintain custody of your assets that we manage/on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15-Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We generally recommend that investment advisory accounts be maintained at Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer, member SIPC, as the qualified custodian. We also maintain a relationship with Fidelity Brokerage Services, LLC ("Fidelity"), a registered broker-dealer, member SIPC, as an alternate qualified custodian which we may recommend from time to time.

We are independently owned and operated and are not affiliated with Schwab or Fidelity. The custodian will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we request that you use Schwab or Fidelity as custodian/broker, you will decide whether to do so and will open your account with the custodian by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at Schwab or Fidelity, we can still use other brokers to execute trades for your account as described below (see "Your brokerage and custody costs"). Conflicts of interest associated with this arrangement are described below as well as in Item 14 (Client referrals and other compensation). You should consider these conflicts of interest when selecting your custodian.

How we select brokers/custodians

We seek to use a custodian/broker that will hold your assets and execute most transactions. on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

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

- Services delivered or paid for by Schwab or Fidelity
- Availability of other products and services that benefit us, as discussed below (see "Products and services available to us from Schwab and Fidelity")

Your brokerage and custody costs

For our clients' accounts that Schwab and Fidelity maintain, Schwab and Fidelity generally do not charge you separately for custody services but are compensated by charging you commissions or other fees on trades that they execute or that settle into your account. Certain trades (for example, many mutual funds and ETFs) may not incur commissions or transaction fees. Schwab and Fidelity are also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program or in Fidelity's Cash Management Program. For some accounts, (generally separately managed accounts), Schwab or Fidelity may charge you a percentage of the dollar amount of assets in the account in lieu of commissions. (Schwab's commission rates applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of at least $500 million of their assets in accounts at Schwab.) This commitment benefits you because the overall commission rates you pay are lower than they would be otherwise. In addition to commissions, Schwab and Fidelity charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have your custodian execute most trades for your account. We have determined that having your custodian execute most 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 "How we select brokers/custodians").

Products and services available to us from Schwab. Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Schwab's support services:

Services that benefit you. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you. Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)

- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

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

- Educational conferences and events
- Consulting on technology, compliance, legal and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel. If clients did not maintain their accounts with Schwab, we would be required to pay for those services from our own resources.

Additional services we receive from Schwab. Schwab has also agreed to pay for certain technology, research, marketing, and compliance consulting products and services on our behalf which includes up to $75,000 in benefits based on transferred assets held at Schwab reaching certain thresholds. The availability of these services from Schwab benefits us because we do not have to produce or purchase them and we do not have to pay for these additional services. The fact that we receive these services from Schwab is an incentive for us to require the use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services see "How we select brokers/ custodians") and not Schwab's services that benefit only us.

Products and services available to us from Fidelity. Fidelity Institutional Wealth Services™ is Fidelity's business serving independent investment advisory firms like us. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Fidelity retail customers. Fidelity also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Fidelity's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Fidelity's support services:

Services that benefit you. Fidelity's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Fidelity include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Fidelity's services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you. Fidelity also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Fidelity's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Fidelity. In addition to investment research, Fidelity also makes available

software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services that generally benefit only us. Fidelity also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Fidelity may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Fidelity may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Fidelity may also provide us with other benefits, such as occasional business entertainment of our personnel.

Additional services we receive from Fidelity. The availability of these services from Fidelity benefits us because we do not have to produce or purchase them. We don't have to pay for Fidelity's services. This is a potential conflict of interest. We believe, however, that our selection of Fidelity as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Fidelity's services (see "How we select brokers/ custodians") and not Fidelity's services that benefit only us. If clients did not maintain their accounts with Fidelity, we would be required to pay for those services from our own resources.

MCF's Chief Compliance Officer, Timothy Gavin, remains available to address any questions that a client or prospective client may have regarding the above arrangements and any corresponding perceived conflict of interest such arrangements may create.

Directed Brokerage. MCF recommends that its clients utilize the brokerage and custodial services provided by *Schwab* or *Fidelity.* MCF does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and MCF will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by MCF. As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. **Please Note**: In the event that the client directs MCF to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through MCF. Higher transaction costs adversely impact account performance. **Please Also Note**: Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

In certain instances and subject to approval by MCF, MCF will recommend to clients certain other broker-dealers and/or custodians, including National Advisors Trust Company ("NATC"), based on the needs of the individual

client, taking into consideration the nature of the services required, the experience of the broker-dealer or custodian, the cost and quality of the services, and the reputation of the broker-dealer or custodian. The client recognizes that broker-dealers and/or custodians have different cost and fee structures and trade execution capabilities. As a result, there may be disparities with respect to the cost of services and/or the transaction prices for securities transactions executed on behalf of the client. These differences are disclosed to advisory clients.

Order Aggregation: Transactions for each client account generally will be effected independently, unless MCF decides to purchase or sell the same securities for several clients at approximately the same time. MCF may (but is not obligated to) combine or "bunch" such orders to obtain better price execution, to negotiate more favorable commission rates, or to allocate equitably among MCF's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. MCF shall not receive any additional compensation or remuneration as a result of such aggregation.

Managed Account Program Trading Practices. Please Note: Client accounts subject to the Managed Account Program(s) managed by Envestnet and/or Independent Managers are subject to the trading practices and policies of the Independent Manager. Such trading practices may differ from those of MCF, and MCF recommends that clients in a Managed Account Program(s) review the Independent Managers' written disclosure statements.

Item 13 – Review of Accounts

MCF reviews client portfolio accounts on a daily basis through the use of portfolio accounting software to monitor allocations. MCF provides to clients quarterly account statements electronically via a web portal or in person meeting. MCF also provides ongoing access to our website where clients can view their portfolio on a daily basis. The website is typically updated on a daily basis the morning following the previous day's close.

Item 14 – Client Referrals and Other Compensation

In the event a client is introduced to MCF by either an unaffiliated or an affiliated promoter (also called solicitor), MCF can pay that promoter a referral fee in accordance with applicable securities laws. Unless otherwise disclosed, any such referral fee is paid solely from MCF's investment management fee and does not result in any additional charge to the client. If the client is introduced to MCF by an unaffiliated promoter, the client will receive a promoter's disclosure statement containing the terms and conditions of the solicitation arrangement and conflicts of interest. Any affiliated promoter of MCF is required to disclose the nature of his or her relationship to prospective clients at the time of the promotion/solicitation.

We receive an economic benefit from Schwab/Fidelity in the form of the support products and services it makes available to us and other independent advisors whose clients maintain their accounts at Schwab/Fidelity. In addition, Schwab has also agreed to pay for certain products and services for which we would otherwise have to pay once the value of our clients' assets in accounts at Schwab reaches a certain size. You do not pay more for assets maintained at Schwab/Fidelity as a result of these arrangements. However, we benefit from the arrangements because the cost of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab/Fidelity, how they benefit us, and the related conflicts of interest are described above under Item 12 Brokerage Practices. The availability to us of Schwab/Fidelity's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

MCF receives client referrals from Charles Schwab & Co., Inc. ("Schwab") through MCF's participation in Schwab Advisor Network® ("the Service"). The Service is designed to help investors find an independent investment advisor. Schwab is a broker-dealer independent of and unaffiliated with MCF. Schwab does not supervise MCF and has no responsibility for MCF's management of clients' portfolios or MCF's other advice or services. MCF pays Schwab fees to receive client referrals through the Service. MCF's participation in the Service raises the ***conflicts of interest*** described below.

MCF pays Schwab a Participation Fee on all referred clients' accounts that are maintained in custody at Schwab and a Non-Schwab Custody Fee on all accounts that are maintained at, or transferred to, another custodian. The Participation Fee paid by MCF is a percentage of the fees the client owes to MCF or a percentage of the value of the assets in the client's account, subject to a minimum Participation Fee. MCF pays Schwab the Participation Fee for so long as the referred client's account remains in custody at Schwab. The Participation Fee is billed to MCF quarterly and may be increased, decreased or waived by Schwab from time to time. The Participation Fee is paid by MCF and not by the client. MCF has agreed not to charge clients referred through the Service fees or costs greater than the fees or costs MCF charges clients with similar portfolios who were not referred through the Service.

MCF generally pays Schwab a Non-Schwab Custody Fee if custody of a referred client's account is not maintained by, or assets in the account are transferred from Schwab. This Fee does not apply if the client was solely responsible for the decision not to maintain custody at Schwab. The Non-Schwab Custody Fee is a one-time payment equal to a percentage of the assets placed with a custodian other than Schwab. The Non-Schwab Custody Fee is higher than the Participation Fees Advisor generally would pay in a single year. Thus, MCF will have an incentive to recommend that client accounts be held in custody at Schwab.

The Participation and Non-Schwab Custody Fees will be based on assets in accounts of MCF's clients who were referred by Schwab and those referred clients' family members living in the same household. Thus, MCF will have incentives to encourage household members of clients referred through the Service to maintain custody of their accounts and execute transactions at Schwab and to instruct Schwab to debit MCF's fees directly from the accounts.

For accounts of MCF's clients maintained in custody at Schwab, Schwab will not charge the client separately for custody but will receive compensation from MCF's clients in the form of commissions or other transaction-related compensation on securities trades executed through Schwab. Schwab also will receive a fee (generally lower than the applicable commission on trades it executes) for clearance and settlement of trades executed through broker-dealers other than Schwab. Schwab's fees for trades executed at other broker-dealers are in addition to the other broker-dealer's fees. Thus, MCF may have an incentive to cause trades to be executed through Schwab rather than another broker-dealer. MCF nevertheless acknowledges its duty to seek best execution of trades for client accounts. Trades for client accounts held in custody at Schwab may be executed through a different broker-dealer than trades for MCF's other clients. Thus, trades for accounts custodied at Schwab may be executed at different times and different prices than trades for other accounts that are executed at other broker-dealers.

As indicated above, MCF employs multiple attorneys to support the needs of MCF clients, though MCF does not hold itself out to be a law firm or provide legal advice. The services these attorneys perform as an employee of MCF is consultative and should not be construed as legal advice. If and when these individuals are engaged to practice law as an outside business activity, it is through a separate entity, MCF Legal, and established by a separate written agreement with the client. Any compensation received by these individuals through this outside business activity (MCF Legal) are in addition to the advisory fee paid to MCF. The client is under no obligation to engage the services of any such recommended professional.

Certain supervised persons of the firm may participate in advisory councils or industry events sponsored by investment product providers. In some cases, such sponsors may reimburse travel, lodging, or conference-related expenses. This creates a conflict of interest because the supervised person has an incentive to recommend or continue recommending products sponsored by such providers. The firm seeks to mitigate this conflict through its investment committee process.

MCF may engage third parties to provide endorsements or testimonials regarding MCF's advisory services. Such endorsements may be made by current clients or non-clients. These individuals or entities ("Promoters") may receive compensation for their endorsements, which may be in the form of cash payments, non-cash compensation, or other economic benefits. Compensation creates a conflict of interest because it provides an incentive for the Promoter to recommend MCF. MCF enters into written agreements with all Promoters, as required by applicable regulations. These agreements describe the scope of the relationship and the compensation to be provided. All testimonials and endorsements are subject to applicable disclosure requirements, including whether the person providing the endorsement is a client and whether compensation has been provided.

Compensation from Vialta and Valo Technologies. MCF receives compensation from Vialta and Valo for referrals. Neither Vialta or Valo are clients of MCF. The referral compensation includes a percentage of the consulting fees Vialta receives from clients MCF introduces, a percentage of the subscription revenue Valo receives from ODI application subscribers MCF introduces, and a percentage of Vialta's consulting revenue generated through other Vialta partners outside MCF's territory. This compensation is paid by Vialta or Valo out of the fees they collect and does not increase the fees clients pay. However, it creates a conflict of interest because MCF has a financial incentive to recommend that clients engage Vialta and Valo, and a financial interest in the success of Vialta's broader business. Before engaging Vialta, clients receive a written disclosure describing the specific compensation MCF receives in connection with their engagement.

MCF's Chief Compliance Officer, Timothy Gavin, remains available to address any questions that a client or prospective client may have regarding the above arrangements and any corresponding perceived conflict of interest such arrangements may create.

Item 15 – Custody

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab or Fidelity to deduct our advisory fees directly from your account (or if you grant us authority to move your money to another person's/entity's account). Your custodian maintains actual custody of your assets. You will receive account statements directly from your custodian at least quarterly. They will be sent to the email or postal mailing address you provided to your custodian. You should carefully review those statements promptly when you receive them. (We also urge you to compare your custodial account statements with the periodic portfolio reports you will receive from us).

MCF engages in other practices and/or services on behalf of its clients that requires disclosure at the Custody section of Form ADV Part 1, which practices and/or services are subject to an annual surprise CPA examination and/or a scheduled annual audit in accordance with the requirements of Rule 206(4)-2 under the Investment Advisers Act of 1940. Specifically, some clients provide MCF with their client login credentials (as discussed in Item 4-Advisory Business; Management of Held Away Assets). We also are deemed to have custody of assets in some Accounting and CFO service engagements (as discussed in Item 4-Advisory Business; Accounting and CFO services) when clients share their account login credentials and/or credit card information with us in furtherance of our engagement, and, when we are retained for bill-payment services.

On February 21, 2017, the SEC Division of Investment Management issued a no-action letter in response to a

letter from the Investment Adviser Association ("IAA"), which outlined a seven condition test, which when met, eliminated the requirement to include accounts with standing letter of authorizations (“SLOA”) in the set of accounts subject to the annual surprise CPA examination. Annually, MCF reviews all SLOAs to determine if the accounts continue to meet the seven conditions. Accounts which do not meet the seven conditions are included in the set of accounts for the annual surprise CPA examination.

In certain situations, including Liminal, we are considered to have custody of client assets due to our relationship with affiliated private investment funds. In the event MCF has custody of an affiliated private investment fund’s assets, an annual audit performed by an independent public accountant will be completed by the private investment fund.

Item 16 – Investment Discretion

MCF usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objective(s) for the particular client account.

When selecting securities and determining amounts, MCF observes the investment objectives, policies, limitations and/or restrictions of the clients for which it advises. For registered investment companies, MCF’s authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made. Investment guidelines and restrictions must be provided to MCF in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, MCF does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. MCF may provide advice to clients regarding the clients’ voting of proxies.

Item 18 – Financial Information

MCF does not solicit fees of more than $1,200 per client, six months or more in advance. As an Advisory firm that maintains discretionary authority for client accounts, MCF is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. At this time, MCF does not reasonably believe it is unable to meet any of its contractual commitments.

ANY QUESTIONS: MCF’s Chief Compliance Officer, Timothy Gavin, remains available to address any questions regarding this Part 2A.