

Creed Evans Financial Advisory, LLC

Item 1: Cover Page

September 22, 2025

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This Form ADV Part 2A is the Creed Evans Financial Advisory, LLC Client Brochure ("Brochure"), the disclosure brochure for clients and other non-institutional clients utilizing Creed Evans Financial Advisory, LLC ("Creed Evans Financial") investment advisory and portfolio management services. This Brochure provides information about the qualifications and business practices of Creed Evans Financial. If you have any questions about the contents of this Brochure, please contact us by phone at 276-708-7084 or by email at creed@creedevansfa.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. Creed Evans Financial is an investment adviser registered under the Investment Advisers Act of 1940. Registration does not imply any level of skill or training. Additional information about Creed Evans Financial also is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2 : Summary of Material Changes

This is an initial filing of Creed Evans Financial's Brochure and, as such, no material changes have been made to the Brochure. A full copy of the Brochure may be requested by email at creed@creedevansfa.com.

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Creed Evans Financial Advisory, LLC

Item 4: Advisory Business

Introduction

Creed Evans Financial Advisory, LLC (“Creed Evans Financial”) is a financial advisory firm that manages investment accounts and provides financial planning for clients . It was established in July 2025 and approved as a registered investment advisor in 09/2025. The owner of the company is John Creed Evans who owns 100% of Creed Evans Financial and is the sole member and manager of the company.

Creed Evans Financial offers investment advisory services to a diverse range of wealth management clients, including, but not limited to: individuals, trusts, estates, charitable organizations, foundations, endowments, and corporations (each referred to as a “Client” or “Wealth Client”). Creed Evans Financial provides continuous and regular investment supervisory services tailored to each Client’s needs.

We consider a client’s full financial picture when creating a financial planning strategy. Our focus is attempting to maximize the efficiency of a client’s capital assets, revenue or income streams, debt obligations, tax advantages, and investment opportunities. Our primary investment strategies may include stocks, bonds, mutual funds, electronically traded funds (“ETFs”), U.S. government and municipal securities, and cash and cash equivalents. Creed Evans Financial may also provide advice regarding investments held in the Client’s portfolio at the inception of our advisory relationship and/or other investment types not listed above depending on suitability for the Client.

Creed Evans Financial may utilize established third-party research services to support decisions related to formulating asset allocation, sector and industry selection, and individual security investment recommendations in constructing and maintaining portfolios.

Clients enter into a fee-based agreement for financial advisory services. Advisory fees charged by the firm may be higher or lower than those available from other service providers. Depending on the type of account or security selected, transactions may incur additional transaction/trade execution costs.

As of December 31, 2024 Creed Evans Financial had no discretionary or nondiscretionary assets under management as it was formed in July 2025.

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Creed Evans Financial Services

Financial Advisory Services

Creed Evans Financial provides comprehensive Advisory Services designed to give clients a complete financial strategy. Our Advisory Services include personalized investment advice and management, integrated financial planning, and guidance in areas such as cash flow optimization, tax strategy and estate planning. We combine tailored advice, practical tools, and proactive management to help clients achieve long-term financial confidence and success.

Financial planning is a comprehensive evaluation of a client's current financial position and future goals, using known variables to project future cash flows, asset values, and withdrawal strategies. The process considers all relevant factors—financial and personal—that may influence or be influenced by the client's overall financial circumstances and life objectives. This process may include:

- Identification of financial priorities and wealth planning objectives
- Development and implementation of tailored financial planning recommendations
- Designs to manage cash flow and debt management
- Long-term planning for college savings, retirement, home-ownership, business investments or other life goals
- Ongoing monitoring of progress toward stated goals, with periodic reevaluation
- Evaluation of estate planning needs
- Tax planning strategies
- Charitable giving strategies
- Coordination with attorneys, accountants, and other professional advisors

Creed Evans Financial also can provide a range of investment advice designed to help clients build and manage their portfolios in alignment with their financial goals. This could include:

- Establishment of investment goals and objectives
- Risk analysis and efficient investing
- Asset allocation rebalancing
- Investment manager selection and mutual fund evaluation
- Ongoing due diligence of investment managers and mutual funds
- Ongoing portfolio performance monitoring
- Periodic reviews of client investment accounts relative to client's stated goals and objectives

Creed Evans Financial also provides direct and separately managed investment supervision on a discretionary basis. This method of investment management could be through:

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- **Customized Portfolio Management:** The advisor designs, revises, and reallocates client customized portfolios based on a comprehensive evaluation of each client's investment objectives, risk tolerance, net worth, income, age, time horizon, tax considerations, prior investment history, family composition, background, and other relevant suitability factors.
- **Individualized Account Management:** Portfolios are managed on a client-by-client basis and may be guided by different client objectives (e.g. maximum capital appreciation, growth, income, growth and income). Clients may impose specific restrictions and guidelines, which may impact the composition and performance of their portfolios. As a result, performance may vary between clients with similar investment objectives. Clients should not expect their portfolio performance to match that of others.
- **Separately Managed Accounts (SMA):** Creed Evans Financial conducts due diligence on a range of independent investment managers and may recommend one or more separately managed account (SMA) managers to clients based on their individual needs and circumstances. In determining an appropriate SMA manager and portfolio management style, Creed Evans Financial considers various factors, including account size, risk tolerance, investment objectives, and the investment philosophy of the selected manager.
 - SMA managers may be engaged to manage client assets on a discretionary basis. Creed Evans Financial monitors the performance of all recommended SMA managers on an ongoing basis as part of its oversight responsibilities.
 - Clients are encouraged to refer to the disclosure brochure or other relevant documents provided by the selected SMA manager for a complete description of the services offered. Creed Evans Financial will furnish copies of the applicable disclosure brochures for each recommended SMA manager.
 - Creed Evans Financial's advisory fee is independent of the fees charged by the SMA managers for the management of separate accounts. Fees associated with each SMA manager vary and are separately disclosed in that manager's disclosure brochure. Depending on the specific SMA program selected, fees may or may not include the cost of trade execution.
 - All recommendations made by Creed Evans Financial are made based on the client's best interest and take into consideration the client's preferences and investment objectives.

Consultations

Creed Evans Financial provides investment advice through individualized consultations. Upon request, the adviser may offer investment advisory and consultation services on a fee-for-service basis with the fee based on the expected number of hours required and any specialized software or quantitative evaluation tools required to complete the project.

To determine an appropriate course of action tailored to each client's needs, the adviser conducts a review of relevant factors. These may include, but are not limited to, the client's

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investment objectives, financial condition, income and tax status, personal and business assets, risk tolerance, and other considerations unique to the client's circumstances.

The adviser obtains necessary information directly from the client to develop recommendations aligned with the client's financial and investment goals.

Wrap Fee Programs

Creed Evans Financial does not sponsor or participate in any wrap fee programs.

Item 5: Fees and Compensation

Advisory Fees

Advisory fees at Creed Evans Financial are structured to include a comprehensive suite of client services under one unified fee. These services can include personalized investment advice and portfolio management, integrated financial planning, and expert guidance in areas such as cash flow optimization, tax strategy, and estate planning. Creed Evans Financial does not charge any fees in advance and fees are typically charged monthly in arrears, based on an average daily balance of the Account(s) market value throughout the month. The fee arrangement is governed by the terms outlined in the advisory agreement. Fees are deducted from the Client's account.

Creed Evans Financial reserves the right, in its sole discretion, to negotiate, reduce, or waive the advisory fee for certain Client accounts for any period of time determined by Creed Evans Financial. Adviser's fees for these services are negotiable based on the specific advisory and management services provided, as outlined in the advisory agreement, but are generally calculated using a percentage of total assets under management using the following tiered schedule. At any time, the maximum Advisory Fee charged by Creed Evans Financial on any account shall not exceed 1.2% annually.

Current Market Value	Maximum Annual Fee
First \$250k	1.20%
Next \$750k (up to \$1M)	0.95%
Next \$4M (up to \$5M)	0.8%
Funds above \$5M	0.65%

The advisory agreement remains in effect until terminated by either party by verbal notice confirmed in writing. However, if the client did not receive this brochure at least 48 hours prior to

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entering into the advisory agreement, the client may terminate the agreement within five business days of signing without penalty.

If the advisory relationship terminates before the end of the month, fees are prorated accordingly, any unearned fees will be refunded to the client, any unpaid fees may be charged to the client. Fees are negotiable and may be waived under certain circumstances. For example, the adviser may, at its discretion, charge a reduced (or no) fee based on factors such as an existing financial planning relationship, anticipated future earning potential, expected asset growth, total assets under management, related accounts, account composition, Client's specific needs or circumstances or other negotiated terms.

Since services, advice, and fees may vary from client to client, Clients may be charged fees not precisely matching fees paid by other Clients.

Creed Evans Financial's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses incurred by the Client.

Clients may incur charges imposed by custodians, brokers (see Item 12 for more information), SMA managers, and other service providers. These charges may include fees charged by investment managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes related to brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in their respective prospectuses. These charges and fees are in addition to Creed Evans Financial's advisory fees.

The adviser may recommend investments in funds-of-funds, which typically carry additional fees beyond those described above. Hedge fund managers generally charge performance fees in addition to management fees. Because funds-of-funds allocate assets among multiple hedge fund managers, each charging its own fees, this results in a layering of fees. Clients should be aware of these additional costs associated with investing in funds-of-funds. Each fund-of-fund discloses its fee structure in its prospectus. Generally, Creed Evans Financial does not receive any portion of these fees.

Fixed Fee Service for Consultations

Some clients engage Creed Evans Financial to provide investment advisory, consultation, or other ancillary services for a fixed or flat fee. The fixed fee is determined based on the anticipated scope of work and is negotiable based on the level and complexity of services required. Generally, advisory fees are determined by the time required for the Adviser to complete the project, billed at an hourly rate ranging from \$75 to \$150. Fees may be assessed on a one-time, per-project basis or as an annual rate billed quarterly in arrears, calculated on a per diem basis as of the date the client agreement is executed. For clients who engage Creed Evans Financial mid-quarter, fees will be prorated accordingly.

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At this time, Creed Evans Financial has no active contracts for Consultation-only clients and agreements and contracts will need to be designed based on the specific services needed.

12b-1 and Other Miscellaneous Fees

Generally, Creed Evans Financial selects institutional class or no-load mutual funds for investment portfolios, which do not generate sales charges. Load and no-load mutual funds may pay annual distribution fees, commonly referred to as 12b-1 fees. These 12b-1 fees are paid from fund assets and, therefore, indirectly reduce client assets. A client's custodian may receive compensation from 12b-1 fees for services such as promotion, advertising, and distribution related to the client's purchases and sales of mutual fund shares in a managed account. Creed Evans Financial does not receive any portion of 12b-1 fees.

Additional costs not included in the fees described above may include fees for portfolio transactions executed away from the custodian selected by the client, dealer mark-ups, electronic fund and wire transfer fees, spreads paid to market-makers, and exchange fees. Custodians may also charge clients additional fees or minimum fees.

Creed Evans Financial is a "fee only" investment advisor and other than its advisory fee described in Part 5 of this Brochure, neither the firm nor its employees receive or accept any direct or indirect compensation related to investments that are purchased or sold for Client accounts. This means that clients will not be sold products or services that create additional fees or compensation to benefit Creed Evans Financial or its representatives, other than those described in this Brochure.

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

Creed Evans Financial does not charge performance-based fees and does not engage in side-by-side management. Advisory fees are only charged as disclosed above in Item 5.

Item 7: Types of Clients

Creed Evans Financial provides investment advisory services to a range of clients, including but not limited to individuals, high-net-worth individuals, trusts, estates, charitable organizations, foundations, endowments, and corporate entities.

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Creed Evans Financial generally requires a minimum initial account size of \$50,000 to establish an investment advisory relationship. This value is subject to market fluctuations, therefore there is no ongoing minimum maintenance requirement. The adviser reserves the right to waive the minimum initial account size at its discretion, based on factors it deems appropriate.

At any time, a client may terminate an account, or withdraw all or part of an Account, or update his or her investment profile, which may initiate an adjustment in the Accounts' holdings.

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

Creed Evans Financial's Analysis and Investment Strategies

Creed Evans Financial's investment strategy begins with a thorough understanding of each client's financial goals. Using demographic and financial information provided by the client, the adviser assesses the client's risk profile and investment objectives to develop an appropriate investment plan.

Investment strategies may include both long-term and short-term purchases of individual stocks, mutual funds, ETFs, fixed income securities, and other suitable investment vehicles where appropriate. Strategies may also involve margin transactions and options.

Creed Evans Financial employs both risk-based and outcome-based approaches to asset allocation. Client portfolios are typically diversified across asset classes, including U.S. equities, international equities, fixed income, cash and cash equivalents, alternative investments (strategic opportunities), commodities, and real estate. The adviser may construct custom allocations for clients or select from pre-built model portfolios developed and maintained by Creed Evans Financial.

Investment recommendations—whether for custom portfolios or model selection—are based on in depth review of the client's individual circumstances and supported by analysis and research. Analytical methods include both fundamental and technical analysis, along with quantitative and qualitative evaluation of specific investments. Resources and investments may be evaluated via cyclical analysis, charting analysis, tactical analysis, modern portfolio theory, and mutual fund or ETF analysis among other methods. Sources for this research may include financial publications, third-party research, annual reports, corporate filings, fund prospectuses, and databases. Additionally, the adviser may use insights from discussions with investment managers and information derived from statistical summaries and other professional resources deemed appropriate.

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Creed Evans Financial may also engage SMAs and/or third-party research providers to assist with asset allocation, sector and industry selection, and specific investment recommendations.

Depending on the suitability for the Client, Creed Evans Financial may opt to use passive, active, or a combination of styles to achieve desired investment results.

Passive investing involves constructing portfolios composed of distinct asset classes, each strategically weighted to achieve a desired balance of correlation, risk, and return. This approach typically utilizes funds that aim to capture the performance of specific asset classes in a cost-efficient manner.

Active investing involves portfolio construction by one or more managers who apply specific strategies or techniques in an effort to outperform a designated benchmark or reduce overall portfolio volatility. Actively managed funds may seek to mitigate downside risk or capitalize on market inefficiencies. Active accounts may involve very frequent trading patterns. This strategy does not guarantee any specific level of returns and may not be suitable for all investors due to the cost of brokerage or transaction expenses as well as a possibility of increased tax liability due to high frequency or short term trading.

Creed Evans Financial's primary focus is on building diversified portfolios—using funds and individual securities—that we believe offer the highest likelihood of helping our clients meet their personal financial goals while minimizing unnecessary volatility and risk, rather than simply seeking to outperform a market index.

Risk Disclosure

Any investment in securities involves inherent risks and the possibility of financial loss that clients should be prepared to bear. Creed Evans Financial cannot guarantee any level of performance or that any Client will avoid a loss of Account assets.

When evaluating risk, financial loss may be perceived differently by each client and may be influenced by a variety of factors. Each factor can impact both the likelihood of adverse outcomes and the severity of potential losses.

While Creed Evans Financial's investment approach is designed to consider and manage risk, it is important to understand the various types of risk that may affect investment outcomes. For mutual funds and other investment company products, clients should refer to each fund's prospectus for additional details.

Below are common investment risks that may be associated with recommended strategies. This list is not exhaustive but outlines some of the key considerations prospective clients should review carefully before engaging Creed Evans Financial's services. These risks should be

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assessed in terms of both their probability and the potential impact on the client's financial situation should they occur.

- **Interest Rate Risk** - Fluctuations in interest rates can cause investment prices—especially fixed income securities—to rise or fall. Generally, when interest rates rise, the value of existing bonds declines.
- **Market Risk** - The value of securities may decline due to market-wide events or conditions unrelated to the specific security and its underlying circumstances. These can include political, economic, or social developments.
- **Volatility and Correlation Risk** - Clients should understand that Creed Evans Financial considers historical price performance and volatility as part of its asset selection process to evaluate future probabilities. However, it is possible that different or traditionally uncorrelated asset classes may move in similar directions at the same time, which can negatively impact portfolio performance. This risk can become more pronounced during periods of market stress or heightened volatility. Past performance is not a guarantee of future results, and any historical returns, expected returns, or probability projections may differ significantly from actual future outcomes.
- **Advisory Risk** – There is no guarantee that Creed Evans Financial's judgment or investment decisions regarding particular securities or asset classes will produce the intended results. Creed Evans Financial's assessments may prove to be incorrect, and a client may not achieve their investment objectives. Additionally, Creed Evans Financial may modify the investment and advisory services it provides over time. Creed Evans Financial and its representatives are not responsible for losses incurred by a client unless such losses result from a breach of Creed Evans Financial's fiduciary duty.
- **Inflation Risk** - Inflation reduces the purchasing power of investment returns over time. A dollar today may buy less in the future if inflation is present.
- **Reinvestment Risk** - The risk that future proceeds from investments may need to be reinvested at lower rates of return, particularly in fixed income portfolios.
- **Business Risk** - Specific industries or companies carry operational or profitability risks. For example, a biotechnology company relies heavily on the success of a single new drug that is still in clinical trials. If the drug fails to receive regulatory approval or shows unforeseen side effects, the company's revenue projections could collapse, leading to a sharp decline in its stock price. If research and approval takes less time or money than expected, profits could soar very quickly. This is a business risk tied to the company's specific operations and dependency on a single product.
- **Liquidity Risk** - Liquidity refers to the ease with which an investment can be converted into cash without significantly affecting its market price. Generally, investments with a broader market and greater investor interest tend to be more liquid. For example, Treasury Bills are considered highly liquid due to their active trading and government backing. In contrast, assets such as real estate or interval funds may be significantly less liquid and investor funds allocated to these illiquid assets may take more time or cost to access.

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- **Financial Risk** - Companies that rely heavily on debt may face financial strain during downturns. Because the company must meet its debt obligations either way, a downturn in revenue could result in a company's inability to meet loan payments, possibly resulting in default or bankruptcy.
- **Concentration Risk** - Overexposure to a single investment, issuer, strategy, or fund complex can increase risk. This may occur when:
 - Clients hold multiple funds managed by the same provider.
 - Portfolios allocate heavily to a single manager or investment theme.
 - A small group of investors represent a significant portion of a fund's assets, amplifying liquidity and redemption risks.

Creed Evans Financial's recommended investment strategies can include any or all of the risks above as well as other risks that are more unique to specific strategies, managers, funds, or instruments. This may include:

- Derivatives (e.g., hedging or speculative options), which require specific expertise and pose unique risks.
- Manager specific concentration risk if a large portion of a client portfolio is allocated to a single manager or fund complex.
- Portfolios including funds with limited operating history or unconventional strategies.
- Alternative or uncommon investment strategies.
- Liquidity or transparency concerns existing in underlying holdings.
- Private Investment Fund Risk. Qualified clients who invest in private funds must acknowledge and accept the unique risks involved and specific factors that are associated with investing in private funds, including but not limited to: lack of liquidity, minimal transparency, high fees, and the potential for total loss of principal.

Any SMA manager recommended by Creed Evans Financial provides detailed risk disclosures separately in their respective brochures and prospectuses. Although Creed Evans Financial recognizes that clients rely on its guidance to manage portfolio risk, clients are encouraged to review the disclosure brochures and prospectuses of recommended managers and to ask questions of their Creed Evans Financial Advisor. Please contact us at 276-708-7084 or creed@creedevansfa.com

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 or prospective client's evaluation of Creed Evans Financial or the integrity of its management.

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No members nor managers of Creed Evans Financial have any reportable legal, financial, regulatory, or other disciplinary item to report to any Client. This statement applies to the firm of Creed Evans Financial as well as any employees or representatives of the firm. Please refer to Form ADV Part 2B for information on any disciplinary history relevant to individual advisors.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

Neither Creed Evans Financial nor any of its management personnel is registered, nor has any application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Other Affiliations

Neither Creed Evans Financial nor any of its management personnel is registered, nor has any application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor or an associated person of the foregoing entities.

Related Persons

Neither Creed Evans Financial nor any of its management personnel maintains any relationships or arrangements with related parties that would present a conflict of interest. his includes any:

- Broker-dealer, municipal securities dealer, or government securities dealer or broker
- Investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
- Other investment adviser or financial planner
- Futures commission merchant, commodity pool operator, or commodity trading advisor
- Banking or thrift institution
- Accountant or accounting firm
- Lawyer or law firm
- Insurance company or agency
- Pension consultant
- Real estate broker or dealer

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- Sponsor or syndicator of limited partnerships

Recommendations or Selection of Other Investment Managers

Creed Evans Financial performs due diligence on a variety of independent investment managers and may recommend one or more separately managed account (SMA) managers to clients when appropriate. Recommendations are tailored to each client's circumstances, taking into account factors such as account size, risk tolerance, investment objectives, and the investment philosophy of the selected manager. Creed Evans Financial does not receive compensation from these SMA managers in exchange for client funds, accounts, or referrals.

Item 11: Code of Ethics

Creed Evans Financial is committed to maintaining the highest standards of integrity, professionalism, and fiduciary responsibility in all client relationships. Creed Evans Financial recognizes its ethical, professional, and legal duty to act as a fiduciary, placing the interests of its clients above its own at all times. Creed Evans Financial actively manages any actual or potential conflicts of interest that may arise in connection with the services provided. Creed Evans Financial maintains an internal Code of Ethics adopted pursuant to SEC rule 204A-1 and will provide a copy of Creed Evans Financial's Code of Ethics to any client or prospective client upon request.

The Code of Ethics is an integral part of Creed Evans Financial's Policies and Procedures and establishes standards of conduct for all officers and employees, consistent with Rule 204A-1 under the Investment Advisers Act of 1940. This Code of Ethics is intended to guide the ethical conduct of all Access Persons and to support Creed Evans Financial's fiduciary duty to clients. While it outlines key principles and specific expectations, it does not address every potential conflict of interest. Adhering to the Code does not exempt any individual from liability in the event of misconduct or breach of fiduciary duty. The core principles of the Code of Ethics are summarized below:

- Integrity – Access persons are expected to offer and provide professional services with honesty and strong moral principles.
- Objectivity – Access persons must remain objective and impartial when delivering professional services to clients.
- Competence – Access persons shall provide services with the requisite knowledge and skill, and must maintain a level of competence appropriate to their responsibilities.
- Fairness – Access persons are required to act in a fair and reasonable manner toward clients, colleagues, and affiliated parties, and must disclose any actual or potential conflicts of interest.

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- Confidentiality – Access persons must safeguard all confidential client information, disclosing such information only with client consent, as required by law, or in response to proper legal process.
- Professionalism – Access persons must conduct themselves in a manner that upholds the reputation and integrity of the advisory profession.
- Diligence – Access persons are expected to act with thoroughness, care, and attention in the execution of their professional duties.

The Code of Ethics includes general obligations for all supervised persons to act in the best interest of clients and in full compliance with applicable laws. It also sets forth specific guidelines related to personal securities trading, the handling of material non-public information (insider trading), the management of conflicts of interest, and the protection of confidential client information.

Every Creed Evans Financial employee receives the Code of Ethics upon joining the advisory team and is required to acknowledge and comply with its provisions. Annually, or as otherwise required, each employee must certify that they have complied with the Code during the prior period.

In accordance with the Code, Creed Evans Financial's directors and employees may engage in personal securities transactions, including in securities that may also be recommended to or purchased for clients. From time to time, Creed Evans Financial, its access persons, or related persons may buy or sell securities for their own accounts at or near the same time that such securities are bought or sold for clients' accounts or at or near the same time that such securities are recommended to clients. This practice could create a potential conflict of interest, as representatives may have the opportunity to profit from trading based on recommendations made to clients.

However, as a fiduciary, the firm is committed to ensuring that such transactions are never conducted to the detriment of clients. Any exceptions or trades requiring pre-clearance must receive prior approval from the firm's Chief Compliance Officer before execution. Employees may also invest in securities that are not purchased for clients.

Creed Evans Financial monitors all employee trading activity and investigates any unusual patterns or potential issues. All employee, member, and manager personal accounts are monitored and reviewed to assess if any actual conflict of interest has occurred to the detriment of Clients. These transactions are evaluated to confirm no patterns of advantageous trading are occurring in any personal accounts of Creed Evans Financial personnel, its access persons, or related persons. Volume, liquidity, and recurrence of these events are considered to determine the effect of trade order in these circumstances and whether a conflict of interest has occurred.

Creed Evans Financial requires that any violations of the Code of Ethics be promptly reported to the Chief Compliance Officer for evaluation and records.

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No employee of Creed Evans Financial, nor any related person, may recommend, advise, or execute a trade for a client involving a security in which the employee, related person, or the firm has a direct or indirect financial interest, unless prior written disclosure of the potential conflict of interest has been provided to the client.

Through these policies, Creed Evans Financial aims to reinforce a culture of transparency and accountability, and to reassure clients that their interests remain the firm's highest priority. We periodically review and update this Code of Ethics to ensure it reflects current legal, regulatory, and ethical standards.

Item 12: Brokerage Practices

Creed Evans Financial seeks to achieve the best overall execution of transactions for Client accounts, consistent with its evaluation of the capabilities and qualifications of the brokers through which such accounts are available. Creed Evans Financial regularly gathers information on prevailing commission rates within the brokerage industry and periodically reviews the overall reasonableness of commissions paid on Client transactions to ensure competitiveness.

"Best execution" refers to the most favorable overall qualitative execution of transactions, which may not always equate to the lowest commission cost. When selecting or recommending brokers, Creed Evans Financial considers a range of factors that are intended to directly benefit Client accounts and support the goal of best execution. These factors include:

- Execution capability and available liquidity;
- Timing and size of specific orders;
- Competitiveness of commission rates;
- Responsiveness and service quality;
- Trading experience and operational reliability;
- Reputation, integrity, and fairness in resolving disputes;
- Quality of technological platforms and interfaces;
- Other considerations relevant to efficient and effective transaction execution.

Creed Evans Financial's selection process reflects a commitment to transparency, client-centered service, and prudent management of trading relationships.

With this in mind, Creed Evans Financial firm recommends Charles Schwab, an independent and unaffiliated SEC-registered broker-dealer and member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). While clients may choose to direct Creed Evans Financial to use a broker-dealer of their preference, Creed Evans Financial generally recommends opening brokerage accounts with Schwab. Creed Evans Financial has no affiliation with Schwab. Ultimately, the Client retains the sole authority to

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select the Custodian to hold their investments by executing the appropriate account opening documents with the chosen broker-dealer. Whether the client directs the brokerage choice or follows Creed Evans Financial's brokerage recommendation, there is no guarantee of achieving the most favorable execution of client transactions and this may result in higher or less favorable transactions within the managed accounts.

Research and Other Soft-Dollar Benefits

We do not have any soft-dollar arrangements with broker-dealers where soft-dollar credits are earned directly based on the commissions paid by Clients. However, as participants on their institutional platform, Schwab may provide certain services that benefit Creed Evans Financial in exchange for client brokerage commissions, markups or markdowns, or other trade execution costs.

Schwab Advisor Services™ serves independent investment advisory firms like Creed Evans Financial by providing Clients and Advisors access to institutional brokerage services including trading, custody, reporting, and related services—many of which are not typically available to retail customers. Schwab also offers various support services, some of which assist Creed Evans Financial in managing and administering Client accounts, while others help with managing and growing our business.

These support services are generally provided on an unsolicited basis and at no cost to us. The benefits received by Creed Evans Financial or its personnel are not contingent on the volume of brokerage transactions directed to Schwab. And any benefits will be used to service all of our clients' accounts with no allocation based on soft dollar credits generated.

As part of our fiduciary duty, Creed Evans Financial prioritizes the interests of our clients at all times. However, clients should be aware that Creed Evans Financial's receipt of economic benefits from Schwab may create a potential conflict of interest and could indirectly influence our choice of Schwab for custody and brokerage services. To mitigate this, Creed Evans Financial regularly reviews the criteria used to select custodians to ensure recommendations remain appropriate.

Brokerage for Client Referrals

Creed Evans Financial does not select or recommend broker-dealers based on the receipt of client referrals or any similar arrangement. Neither the firm nor any related persons receive client referrals or other incentives from broker-dealers or third parties in exchange for recommending their services. Our brokerage recommendations, when made, are based solely on factors such as execution quality, reliability, cost, and overall benefit to our clients.

Creed Evans Financial Advisory, LLC

Block Trading and Aggregation Disclosure

When managing advisory accounts on a discretionary basis, Creed Evans Financial may combine multiple client orders to purchase shares of the same security ("block trading"). This aggregation occurs whenever feasible and when it aligns with clients' best interests.

- We place a single block trade once orders are aggregated, then allocate the shares among participating accounts in a fair and equitable manner.
- Allocations are generally based on account size, not on performance or fee structure.
- In situations with limited liquidity or partial fills, Creed Evans Financial may execute multiple smaller block trades over time and allocate accordingly.
- All participating accounts receive the same average share price across all executions.
- Transaction costs are shared proportionally across all participating accounts.
- Accounts held by Creed Evans Financial or its affiliates may participate in block trades alongside client accounts. These non-client accounts are not granted any preferential treatment in execution or allocation.

Item 13: Review of Accounts

Client accounts are managed by the Client's Financial Advisor, who is responsible for conducting periodic reviews, consulting with clients, and staying informed of any changes to their clients' goals and objectives. Creed Evans Financial also conducts ongoing reviews of markets, sectors, and individual securities while monitoring unaffiliated mutual fund holdings and outside investment managers. Client accounts are continuously monitored and periodically rebalanced to maintain a Client's targeted risk tolerance and pursue the optimal return for the Client's risk level. Creed Evans Financial may consider tax implications and the volatility associated with each chosen asset class when deciding when and how to rebalance.

Clients with accounts at Charles Schwab will have continuous access via the Charles Schwab website, app, or other services to real-time reporting information about Account status, securities positions, and balances. Clients may also receive periodic e-mail communications describing portfolio performance, account information, and product features.

Clients will receive monthly account reports directly from Charles Schwab indicating investment performance, account transactions, and trade details. On a quarterly basis, Creed Evans Financial contacts each Client to remind them to review and update the profile information they previously provided. This assists in the Financial Advisor's review of allocations, risk status, income needs, tax implications, constraints, and other important factors that may necessitate a strategy alteration to a Client portfolio. Creed Evans Financial will also confirm availability of the Client's Financial Advisor at least once per quarter for a review and comprehensive update of any necessary changes to the Client's financial plan to be conducted upon request and appointment by the Client. With or without a client appointment completed, the Financial Advisor

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will provide the client with a written summary of the account activity and performance at least quarterly.

Creed Evans Financial receives daily transaction information from Charles Schwab and maintains access to Client accounts through their institutional advisor platforms. Clients agree to notify Creed Evans Financial in writing of any material changes to their investment goals, objectives, or financial situation that may affect how their assets should be managed. Additionally, clients who wish to impose reasonable restrictions on the management of their accounts may do so by contacting their Financial Advisor or Creed Evans Financial.

Clients with portfolios including private equity and other private investments (“private funds”) should be aware that quarterly valuations may lag by up to 60 days following a quarter-end. Since Creed Evans Financial relies on capital account statements provided by issuers or qualified custodians for private fund valuations used in quarterly portfolio reviews and reports, these reports will reflect the most recent valuation available. Consequently, a client’s actual private fund holdings may differ significantly from the values shown on their portfolio report. Clients may contact Creed Evans Financial during normal business hours or via appointment to discuss the management of their accounts.

Item 14: Client Referrals and Other Compensation

Creed Evans Financial does not pay for or compensate third parties or clients for referrals of new accounts, clients, or assets.

Economic Benefits from Non-Clients

Creed Evans Financial does not receive any economic benefits from non-clients in connection with providing investment advice or other advisory services to our clients. This means that we do not accept sales awards, prizes, or other forms of compensation from third parties that could create an incentive to recommend particular investments, products, or services. By declining such arrangements, we ensure that our recommendations and advice are made exclusively with our clients’ best interests in mind.

Item 15: Custody

Creed Evans Financial does not maintain physical custody of any client funds or securities. Creed Evans Financial is considered to have custody of client funds or securities in limited

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circumstances, specifically, when we are authorized to deduct advisory fees directly from a client's account.

Creed Evans Financial provides investment instructions to the client's chosen custodian—such as Charles Schwab or another qualified custodian—regarding the investment and management of the client's assets (see Item 10 for additional details).

Clients receive official account information, including trade confirmations and monthly statements, directly from the custodian via their secure login portal. Clients are strongly encouraged to review these statements carefully and compare them with any reports or updates provided by Creed Evans Financial to evaluate account performance, portfolio holdings, and transactions. Differences between the custodian's records and reports generated by Creed Evans Financial may occur due to varying accounting practices, reporting periods, or valuation methods used for certain securities.

Creed Evans Financial does not serve as a qualified custodian for client assets. The custodian's trade confirmations and account statements serve as the official record of the client's account.

Item 16: Investment Discretion

Creed Evans Financial provides investment management services on a discretionary basis. This discretionary authority, provided through a power of attorney, allows Creed Evans Financial to make decisions regarding the timing, size, and selection of securities to be bought or sold in the Client's account. This means Creed Evans Financial is authorized to make investment decisions on the Client's behalf without obtaining the Client's prior approval for each transaction. This authority must be explicitly granted in the Client's signed advisory agreement.

Creed Evans Financial's discretionary authority is limited to investment decisions. With the exception of deducting advisory fees directly from the Client's custodial account, Creed Evans Financial does not have the authority to withdraw funds or securities from the Client's account.

If the Client prefers, they may place reasonable restrictions on Creed Evans Financial's discretionary authority. For example, the Client may limit the types of securities we may purchase, direct cash reserve limits, or specify other investment guidelines. Any such restrictions must be provided to Creed Evans Financial in writing.

For more details about Creed Evans Financial's discretionary portfolio management services, please see the "Item 4: Advisory Business" section of this Brochure.

Creed Evans Financial Advisory, LLC

Item 17: Voting Client Securities

Clients are responsible for voting proxies related to securities held in their portfolios. Proxy materials and other solicitations will be sent directly to clients by their custodian. Clients are welcome to contact Creed Evans Financial by phone or email with any questions regarding these materials.

Item 18: Financial Information

Registered investment advisers are required to provide clients with certain financial information or disclosures about the Adviser's financial condition. Creed Evans Financial has no financial commitment that impairs its ability to meet its contractual and fiduciary obligations to clients and has not been the subject of any bankruptcy proceeding.

Creed Evans Financial does not take physical custody of client funds or securities or serve as signatory for client accounts and we do not require the prepayment of any fees more than six months in advance.

Privacy Policy and Business Continuity Plan

Creed Evans Financial's Privacy Policy and Business Continuity Plan are available upon request. Clients may access this information by contacting the office directly or visiting the company website when available.

Item 19: Requirements for State-Registered Advisors

Creed Evans Financial Advisory is owned and managed by member John "Creed" Evans. John Creed Evans earned a Bachelor of Arts degree from Tulane University, graduating *magna cum laude*. He completed a major in Philosophy, a second major in Political Identity, and a minor in Music. He received departmental honors from both the Philosophy and Political Science departments. John Creed Evans has worked for Athena Consulting as a Case Investigator Supervisor during the COVID-19 pandemic. He has also deployed with Team Rubicon to assist FEMA and the WHO in COVID responses internationally and at home. John Creed Evans has relied on his investment tactics, strategies, and knowledge as his primary source of income for

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the majority of the past 12 years. His experience in applying these approaches has shaped the foundation of Creed Evans Financial and informs the guidance he provides to clients today.

John Creed Evans is not presently actively engaged in any other business outside of providing investment advice through Creed Evans Financial.

Creed Evans Financial does not charge or administer performance-based fee structures. In addition, no Investment Adviser Representatives or other firm representatives are compensated for providing advice based on the performance of a client's account. All fees are structured to align with transparent, predetermined arrangements, ensuring that client interests remain the sole priority in the advisory relationship.

John Creed Evans and Creed Evans Financial are required to disclose all material facts regarding any legal and disciplinary events that may be material to your evaluation of the representative or the firm. Neither John Creed Evans nor Creed Evans Financial have any information applicable to this item.

John Creed Evans and Creed Evans Financial have no relationships or arrangements with any issuer of securities.

Creed Evans Financial Advisory, LLC

Creed Evans Financial Advisory, LLC–ADV Part 2B– Investment Advisor Representatives

This Brochure supplement provides information about the participating members of the Creed Evans Financial Advisory, LLC (“Creed Evans Financial”). 100% of the Creed Evans Financial Advisory is owned and managed by member John Creed Evans. John Creed Evans is responsible for Creed Evans Financial’s investment research, capabilities, strategies, and results, across business lines and client segments.

Please contact Creed Evans Financial at 276-708-7084 or via email at creed@creedevansfa.com if you have any questions about the contents of this supplement. Additional information about Creed Evans Financial and its members is available on the SEC’s website at www.adviserinfo.sec.gov.

John Creed Evans,

Principal | Managing Director | Chief Investment Officer | Chief Compliance Officer
Born: 1989

Educational Background and Business Experience

Educational Background

John Creed Evans earned a Bachelor of Arts degree from Tulane University, graduating *magna cum laude*. He completed a major in Philosophy, a second major in Political Identity, and a minor in Music. He received departmental honors from both the Philosophy and Political Science departments.

Business Experience

07/2025-present | **Creed Evans Financial Advisory LLC** | Principal, Managing Director, Chief Investment Officer, Chief Compliance Officer

08/2020-07/2021 | **Athena Consulting** | District COVID-19 Case Investigator Supervisor

04/2021–05/2021 | WHO Emergency Medical Team for COVID Hospital Decompression In Papua New Guinea w/ **Team Rubicon** | Logistics Coordinator

03/2021--04/2021 | FEMA Vaccination Effort w/ **Team Rubicon** | Strike Team Leader

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Disciplinary Information

All representatives of investment advisors are required to disclose all material facts regarding any legal and disciplinary events that may be material to your evaluation of the representative. John Creed Evans does not have any information applicable to this item.

Other Business Activities

John Creed Evans has no other business activities to disclose.

Additional Compensation

John Creed Evans is sole owner of Creed Evans Financial Advisory, LLC and, as such, receives proceeds of profits from the company which may be paid in addition to any salary received.

Supervision

John Creed Evans is sole owner, member, and active “employee” of Creed Evans Financial Advisory, LLC. at this time and, as such, is responsible for his own supervision and does not supervise any other parties.

Requirements for State-Registered Advisors

John Creed Evans has not been involved in any bankruptcy proceeding or affiliated with any company or entity involved in any bankruptcy proceedings and has no other legal or disciplinary events to disclose.