

## Item 1: Cover Page

**Investing Forever LLC**

3392 Bollard Road  
West Palm Beach, FL 33411

**Form ADV Part 2A – Firm Brochure**

(973) 842-6420

Dated March 29, 2023

This Brochure provides information about the qualifications and business practices of Investing Forever LLC, “IFA”. If you have any questions about the contents of this Brochure, please contact us at (973) 842-6420. 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.

Investing Forever LLC is registered as an Investment Adviser with the State of Florida. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about IFA is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the firm’s identification number CRD #301680.

## Item 2: Material Changes

Since the previous filing of this brochure, the following material changes have been made:

- The firm's fees have changed. Please see Item 5 for more information.
- Charles Schwab has added as a custodian. Please see Item 12 for further information.
- Please see Item 15 for amendments to the firm's ability to use SLOAs with clients.

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by the securities regulators. Either this complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of IFA.

## Item 3: Table of Contents

### Contents

<b>Item 1: Cover Page</b>	<b>1</b>
<b>Item 2: Material Changes</b>	<b>2</b>
<b>Item 3: Table of Contents</b>	<b>3</b>
<b>Item 4: Advisory Business</b>	<b>4</b>
<b>Item 5: Fees and Compensation</b>	<b>7</b>
<b>Item 6: Performance-Based Fees and Side-By-Side Management</b>	<b>8</b>
<b>Item 7: Types of Clients</b>	<b>8</b>
<b>Item 8: Methods of Analysis, Investment Strategies and Risk of Loss</b>	<b>8</b>
<b>Item 9: Disciplinary Information</b>	<b>10</b>
<b>Item 10: Other Financial Industry Activities and Affiliations</b>	<b>10</b>
<b>Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b>	<b>11</b>
<b>Item 12: Brokerage Practices</b>	<b>12</b>
<b>Item 13: Review of Accounts</b>	<b>13</b>
<b>Item 14: Client Referrals and Other Compensation</b>	<b>14</b>
<b>Item 15: Custody</b>	<b>14</b>
<b>Item 16: Investment Discretion</b>	<b>15</b>
<b>Item 17: Voting Client Securities</b>	<b>15</b>
<b>Item 18: Financial Information</b>	<b>15</b>
<b>Item 19: Requirements for State-Registered Advisers</b>	<b>16</b>
<b>Form ADV Part 2B – Brochure Supplement</b>	<b>18</b>
<b>Item 2: Educational Background and Business Experience</b>	<b>19</b>
<b>Item 3: Disciplinary Information</b>	<b>20</b>
<b>Item 4: Other Business Activities</b>	<b>20</b>
<b>Item 5: Additional Compensation</b>	<b>20</b>
<b>Item 6: Supervision</b>	<b>20</b>
<b>Item 7: Requirements for State Registered Advisers</b>	<b>20</b>

## Item 4: Advisory Business

### Description of Advisory Firm

Investing Forever LLC is registered as an Investment Adviser with the State of Florida. We were founded in February 2019. Trishul Patel, CFP® is the principal owner of IFA. IFA currently reports \$7,792,123 in discretionary and \$1,917,745 in non-discretionary Assets Under Management. Assets Under Management were calculated as of December 31, 2022.

### Types of Advisory Services

#### Project-Based Financial Planning and Investment Advisory Services

We provide Project-Based Financial Planning and Investment Advisory Services on topics such as retirement planning, risk management, college savings, cash flow, debt management, work benefits, investment analysis, as well as other areas of focus based on the needs of the client.

Financial planning involves evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the client. Investment advisory involves the determination of an asset allocation based upon the client's goals and risk tolerance. Clients purchasing these services will receive a written or an electronic report, providing the client with a detailed plan designed to achieve his or her stated financial goals and/or investment objectives. The Planner does not implement provided investment recommendations on behalf of the client under these services. Please see Ongoing Investment Management Services for our portfolio management options.

In general, the financial and/or investment plan will address any or all of the following areas of concern. The client and advisor will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- **Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

- **Investment Portfolio Analysis:** This may involve developing an asset allocation strategy to meet clients’ financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Investment Fee Analysis:** This may involve an analysis and assessment of your current investment related fees in order to provide a better understanding of the long-term impact that these fees can have on your investment goals. In addition, we will explore lower fee alternatives with you that aim to provide similar market exposures, but at a lower cost. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

### Ongoing Financial Planning and Investment Management Services

This service involves working one-on-one with a planner over an extended period of time. Clients get to work with a planner who will work with them to develop and implement their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up to date.

Upon desiring a financial plan, a client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports,

employee benefit, retirement planning, insurance, investments, college planning, and estate planning. Once the client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the client. Clients subscribing to this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. If a follow up meeting is required, a meeting will be scheduled to occur at the client's convenience. The plan and the client's financial situation and goals will be monitored throughout the year and follow-up meetings, phone calls, and emails will be made and communicated to the client to confirm that any agreed upon action steps have been carried out. On an annual basis, there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be coordinated and/or implemented at that time.

This service also includes continuous advice to a client regarding the investment of client funds based on the individual needs of the client. The Adviser will determine a target Portfolio allocation between various asset classes (such as equities and fixed income) that is designed to be consistent with the investment objectives communicated by the Client to the Adviser. The Adviser will periodically review the Portfolio and implement changes that the Adviser deems appropriate. The Adviser may change the target asset class allocations, and/or the specific assets held in the Portfolio.

Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

### **Tax Preparation & Tax Planning Services**

We offer Tax Preparation Services for our clients to assist with the filing of federal and state tax returns for individuals, trusts, and businesses. The fees associated with tax preparation services, as disclosed in Item 5, are separate and in addition to your Ongoing Financial Planning or Investment Management Services and XYTS will bill you directly for Tax Preparation and Planning Services. Their fees will be reviewed and agreed to in your agreement with them at the start of the engagement. We will utilize the services of XY Tax Solutions "XYTS", a third-party accounting and tax planning firm, to facilitate the preparation and filing of your tax return and we will work with you and XYTS to gather the necessary information as part of this service. If the client also engages us for Tax Planning Services, XYTS's licensed CPAs will work with the client to also conduct research and answer tax-related questions to help the client adequately plan through certain transactions and financial changes so that they can fully understand any tax consequences or opportunities for savings in the future.

### **Held Away Account Services**

We provide an additional service for accounts not directly held in our custody but where we do have discretion and may leverage an Order Management System to implement asset allocation or rebalancing strategies on behalf of the client. These are primarily 401(k) accounts, 529 plans, variable annuities, and other assets we do not custody. For situations where we leverage the Order Management System, we regularly review the current holdings and available investment options in these accounts, monitor the accounts, rebalance and implement our strategies as necessary. For situations where the Order Management System is not utilized, we regularly review the current holdings and available investment options in these accounts, and monitor the accounts; however, the client must rebalance and implement the strategies as necessary.

#### **Pontera Solutions, Inc.**

In cases where the Client chooses to have IFA advise on assets that are not held at a qualified custodian in which IFA has an advisory relationship (See Item 12 of this Brochure) referred to as "held-away accounts," IFA is able to provide investment management services of those held-away accounts through a third-party order management system, Pontera Solutions, Inc ("Pontera"). These held-away accounts include 401(k) accounts, 529 plans, variable annuities, and other similar accounts.

Access to held-away accounts is achieved by the Client giving permission via a provided link through Pontera for the Advisor to make asset allocation changes via the Client's online login credentials. These online credentials are never made available to, held or stored by IFA. Access is restricted and Advisor will only have permissions to make changes to the allocation of funds or other securities in the account and will not at any time be able to adjust, add to or subtract from investment options, or any other plan policies or fees assessed by the plan or the fund providers, access the financial assets in the account, make deposits, withdrawals or distributions. These assets will be monitored using third party account aggregation software where the account values and holdings are transmitted and viewed from the account aggregation software. These assets are included in calculating the total assets under management when assessing the annual advisory fee.

## Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

## Wrap Fee Programs

We do not participate in wrap fee programs.

## Item 5: Fees and Compensation

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment management contract, the investment management contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees or penalties. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

Clients engaging IFA for services prior to this ADV update will be grandfathered into their existing fee structure and all terms of the existing agreement will be in effect until a new agreement or addendum to the current agreement is executed.

### Project-Based Financial Planning and Investment Advisory Fixed Fee

Project-Based Financial Planning and Investment Advisory will generally be offered on a fixed fee basis. The fixed fee will be agreed upon before the start of any work. The fixed fee can range between \$600 and \$8,000 depending on complexity and scope of the project. The fee is negotiable. If a fixed fee program is chosen, the fee will be due at completion of work. Fees for this service may be paid by electronic funds transfer or check. Since project based fees are paid in arrears, no refund will be due upon termination of the agreement.

### Ongoing Financial Planning Services

Ongoing Financial Planning consists of an ongoing fee that is paid monthly, in arrears, at the rate of \$450 per month. The fee is negotiable. Fees for this service may be paid by electronic funds transfer or check. This service may be terminated with 30 days' notice. Since ongoing financial planning fees are paid in arrears, no refund will be due upon termination of the agreement. Ongoing Financial Planning clients with less than \$600,000 in assets under management with IFA are offered Ongoing Investment Management Services at no additional cost.

### Ongoing Investment Management Services

Our standard advisory fee is based on the market value of the assets under management and may also include held away accounts that the client chooses to have our firm advise on and regularly monitor. The standard advisory fee is calculated as follows:

Account Value	Annual Advisory Fee
\$1,000,000 and Below	0.90%
\$1,000,001 - \$5,000,000	0.30%
\$5,000,001 - \$10,000,000	0.25%
\$10,000,000 and Above	0.20%

The annual fees are negotiable and are pro-rated and paid in arrears on a quarterly basis. The advisory fee is a blended fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart and applying the fee to the account value as of the last day of the previous quarter. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement. With this service, our Ongoing Financial Planning Services are included without incurring an additional fee.

Advisory fees are directly debited from client accounts, or the client may choose to pay by electronic funds transfer or check. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the account.

We charge an annual fee for services provided to these held away accounts, which is deducted from an account under our Investment Management Service on a quarterly basis in arrears or by other means such as invoicing. Fees are based on the standard fee schedule according to the valuation of the accounts at the close of the quarter as valued by the account custodian.

### **Tax Preparation & Tax Planning**

The fees for Personal Tax Return Preparation will be determined based on the complexity of the return and quality of the client's recordkeeping. XYTS will bill you directly for Tax Preparation and Planning Services. Their fees will be reviewed and agreed to in your agreement with them at the start of the engagement. The fees may be negotiable in certain cases, will be agreed to at the start of the engagement, and are due at the end of the engagement. Clients are not required to utilize any third-party products or services that we may recommend and they can receive similar services from other professionals at a similar or lower cost.

### **Other Types of Fees and Expenses**

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees and do not engage in side-by-side management.

## **Item 7: Types of Clients**

We provide financial planning and investment management services to individuals, high net-worth individuals, charitable organizations, corporations and other businesses.

Our minimum account size requirement is \$600,000 for Ongoing Investment Management Services. We do not have a minimum account size requirement for Ongoing Financial Planning Services or Project-Based Services.

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

When clients have us complete an Investment Analysis (described in Item 4 of this brochure) as part of their financial and/or investment plan, our primary methods of investment analysis for discretionary and non-discretionary passive investment management accounts will be efficient-market hypothesis.

### **Passive Investment Management (Efficient-Market Hypothesis)**

We primarily practice passive investment management. Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.



Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market.

## Material Risks Involved

**All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

**Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time, these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

## Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Commercial Paper** is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured, the risk to the investor is that the issuer may default.

**Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such

as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

**Bank Obligations** including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Options and other derivatives** carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the clients invest.

**Investment Companies Risk.** When a client invests in open-end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

## Item 9: Disciplinary Information

### Criminal or Civil Actions

IFA and its management have not been involved in any criminal or civil action.

### Administrative Enforcement Proceedings

IFA and its management have not been involved in administrative enforcement proceedings.

### Self-Regulatory Organization Enforcement Proceedings

IFA and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of IFA or the integrity of its management.

## Item 10: Other Financial Industry Activities and Affiliations

No IFA employee is registered, or has an application pending to register as a broker-dealer or a registered representative of a broker-dealer.

No IFA employee is registered, or has an application pending to register as a futures commission merchant, commodity pool operator or a commodity trading advisor.

IFA does not have any related parties. As a result, we do not have a relationship with any related parties.

IFA only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and also accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

### Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matters shall reflect the credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any client or prospective client upon request.

### Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a client or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

### Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its "related persons" do not invest in the same securities, or related securities, e.g., warrants, options or futures, which we recommend to clients except for passive index funds and ETFs.

### Trading Securities At/Around the Same Time as Client's Securities

Because our firm and its "related persons" do not invest in the same securities, or related securities, e.g., warrants, options or futures, which we recommend to clients (except for passive index funds and ETFs), we do not trade in securities at or around the same time as clients (except for passive index funds and ETFs).

## Item 12: Brokerage Practices

### Factors Used to Select Custodians and/or Broker-Dealers

Investing Forever LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to the client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

#### 1. Research and Other Soft-Dollar Benefits

We currently receive benefits as a result of our relationship with TD Ameritrade Institutional.

#### 2. Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

#### 3. Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve the most favorable execution of client transactions and this may cost clients money over using a lower-cost custodian.

### The Custodian and Brokers We Use (TD Ameritrade)

Advisor participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent [and unaffiliated] SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance, and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.)

### The Custodian and Brokers We Use (Charles Schwab)

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide our Clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. 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. The benefits received by Advisor or its personnel do not depend on the number of brokerage transactions directed to Schwab. As part of its fiduciary duties to Clients, Advisor at all times must put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Schwab for custody and brokerage services. This conflict of interest is mitigated as Advisor regularly reviews the factors used to select custodians to ensure our recommendation is appropriate. Following is a more detailed description of Schwab's support services:

- 1. 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.
- 2. 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
3. **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
4. **Your brokerage and custody costs.** For our Clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees.

## The Custodian and Brokers We Use (Vanguard)

We may recommend that our clients use The Vanguard Group, Inc. dba Vanguard Group Inc ("Vanguard"), a registered broker-dealer and member of the SIPC, as the qualified custodian. Our firm is independently owned and operated and is not affiliated with Vanguard. While we recommend that you use Vanguard as custodian, you will decide whether to do so and will open your account with Vanguard by entering into an account agreement directly with them. We do not open the account for you and will be unable to directly assist you in doing so. Whenever possible, we will do our best to indirectly assist in opening an account with Vanguard. Once an account has been opened, a limited power of attorney may be enacted if the client wishes for our firm to have such authority and may be revoked at the client's discretion. If you do not wish to place your assets with Vanguard and execute a limited power of attorney, then we cannot manage your account at Vanguard. Client accounts may be opened directly with Vanguard's retail business. Because Vanguard does not provide an institutional platform for Registered Investment Advisors, even when an advisor-client limited power of attorney is present, our firm will not have the ability to have advisory fees deducted directly from client accounts. Advisor-client fees and compensation will follow items outlined in our firm's advisor-client agreement.

## 529 Plans

my529 is a 529 college savings plan sponsored by the State of Utah. Although money contributed to my529 may be invested in portfolios that invest in underlying mutual funds, my529 is not itself a mutual fund. The State of Utah has created a trust specifically for the purpose of offering 529 college savings plans, including my529. My529 is a 529 plan legally known as a "qualified tuition program." Section 529 qualified tuition programs are intended to be used to save only for qualified education expenses of a beneficiary. Investments in my529 are not insured or guaranteed. However, Federal Deposit Insurance Corporation (FDIC) insurance is provided for the FDIC-insured accounts up to certain limits. Units in my529 are not registered with the United States Securities and Exchange Commission (SEC) or with any state securities regulators.

## Aggregating (Block) Trading for Multiple Client Accounts

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs.

## Item 13: Review of Accounts

Client accounts with the Investment Management Service will be reviewed regularly on a quarterly basis by Trishul Patel, CFP®, Member and CCO. The account is reviewed with regards to the client's investment policies and risk tolerance levels. Events that may

trigger a special review would be unusual performance, addition or deletions of client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

IFA will provide written reports to Investment Advisory clients on an annual basis. We urge clients to compare these reports against the account statements they receive from their custodian. These reports will contain information regarding the client's holdings and portfolio performance.

## Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

As disclosed under Item 12, above, Advisor participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by the Advisor or its personnel through participation in the program do not depend on the number of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

## Item 15: Custody

IFA does not accept custody of client funds except in the instance of withdrawing client fees.

For client accounts in which IFA directly debits their advisory fee:

- i. IFA will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
- ii. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.
- iii. The client will provide written authorization to IFA, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains the client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.



All accounts are held by an independent Custodian selected by the client. With the exception of IFA's ability to debit fees, and the ability to disburse or transfer certain funds to third parties pursuant to Standing Letters of Authorization executed by Clients, IFA does not otherwise have custody of the assets in the account.

IFA can establish a standing letter of instructions or other similar asset transfer authorization arrangements ("SLOA") with qualified custodians in order for us to disburse funds to accounts as specifically designated by the client. With a SLOA a client can typically authorize first-party and/or third-party transfers. If transfers are third-party, IFA complies with each of the requirements and conditions enumerated below:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The client authorizes IFA, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
4. The client has the ability to terminate or change the instruction to the client's qualified custodian.
5. IFA has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
6. IFA maintains records showing that the third party is not a related party of IFA or located at the same address as IFA.
7. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

## Item 16: Investment Discretion

For those client accounts where we provide Investment Management Services, we manage accounts on either a discretionary or non-discretionary basis depending on the needs of the client. When we manage on a discretionary basis, we will not require the client's authorization prior to each security trade. When managing on a non-discretionary basis, we require the client's authorization prior to each trade. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client. Clients are able to specify, within reason, any limitations they would like to place on discretionary authority as it pertains to individual securities and/or sectors that will be traded in their account, by notating these items on the executed advisory agreement.

## Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

## Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

## Item 19: Requirements for State-Registered Advisers

**Trishul Patel, CFP®** Born: 1980

### Educational Background

- 2010 – Master of Business Administration, Cornell University
- 2003 – Masters of Engineering, Cornell University
- 2002 – Bachelors of Science, Cornell University

### Business Experience

- 02/2019 – Present, Investing Forever LLC, Member and CCO
- 10/2018 – 01/2019, Unemployed, Extended Travel
- 05/2014 – 10/2018, SandPointe Asset Management, LLC, Senior Managing Director
- 06/2011 – 05/2014, RMG Technology (Malaysia) SDN BHD, Team Leader

### Professional Designations, Licensing & Exams

**CFP (Certified Financial Planner)®**: The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards or practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real word circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by the CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals. Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:
- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.



CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Other Business Activities**

Trishul Patel, CFP® is not involved with outside business activities.

### **Performance-Based Fees**

IFA is not compensated by performance-based fees.

### **Material Disciplinary Disclosures**

No management person at Investing Forever LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

### **Material Relationships That Management Persons Have With Issuers of Securities**

Investing Forever LLC, nor Trishul Patel, CFP®, have any relationship or arrangement with issuers of securities.

### **Additional Compensation**

Trishul Patel, CFP® does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through IFA.

### **Supervision**

Trishul Patel, CFP®, as Member and Chief Compliance Officer of IFA, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

### **Requirements for State Registered Advisers**

Trishul Patel, CFP® has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

### **Business Continuity Plan**

IFA Financial maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including the death of the investment adviser or any of its representatives.

**Investing Forever LLC**

3392 Bollard Road  
West Palm Beach, FL 33411  
(973) 842-6420

Dated March 29, 2023

Form ADV Part 2B – Brochure Supplement

*For*

**Trishul Patel, CFP® - Individual CRD #7093411**

**Member and Chief Compliance Officer**

This brochure supplement provides information about Trishul Patel, CFP® that supplements the Investing Forever LLC (“IFA”) brochure. A copy of that brochure precedes this supplement. Please contact Trishul Patel, CFP® if the IFA brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Trishul Patel, CFP® is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number CRD #7093411.

## Item 2: Educational Background and Business Experience

### Trishul Patel, CFP®

Born: 1980

#### Educational Background

- 2010 – Master of Business Administration, Cornell University
- 2003 – Masters of Engineering, Cornell University
- 2002 – Bachelors of Science, Cornell University

#### Business Experience

- 02/2019 – Present, Investing Forever LLC, Member and CCO
- 10/2018 – 01/2019, Unemployed, Extended Travel
- 05/2014 – 10/2018, SandPointe Asset Management, LLC, Senior Managing Director
- 06/2011 – 05/2014, RMG Technology (Malaysia) SDN BHD, Team Leader

#### Professional Designations, Licensing & Exams

**CFP (Certified Financial Planner)®:** The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards or practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real word circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by the CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals. Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:
- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### Item 3: Disciplinary Information

No management person at Investing Forever LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

### Item 4: Other Business Activities

Trishul Patel, CFP® is not involved with outside business activities.

### Item 5: Additional Compensation

Trishul Patel, CFP® does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through IFA.

### Item 6: Supervision

Trishul Patel, CFP®, as Member and Chief Compliance Officer of IFA, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

### Item 7: Requirements for State Registered Advisers

Trishul Patel, CFP® has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.