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KTF Investments, LLC

Wrap Fee Program Brochure
Form ADV Part 2A, Appendix 1

July 2026

Firm Contact: Karey Williams
Chief Compliance Officer

Item 1 - Cover Page

This wrap fee program Brochure provides information about the qualifications and business practices of KTF Investments, LLC ("KTF," or "firm"). If you have any questions about the contents of this Brochure, please contact us at 312-479-5305. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about our firm is also available on the SEC's website at www.adviserinfo.sec.gov by searching CRD #337465.

Please note that the use of the term "registered investment adviser" and description of our firm and/or our associates as "registered" does not imply a certain level of skill or training. Clients are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise clients for more information on the qualifications of our firm and our employees.

Item 2 - Material Changes:

This Brochure, dated July 29, 2026, was prepared in accordance with SEC requirements and contains no material changes. We will provide you with an updated brochure, as required based on the changes or new information, or upon request at any time without charge.

You may also obtain a copy of this brochure by contacting Karey Williams by phone at 312-479-5305, or by email at karey@hayeslawandcompliance.com.

Additional information about KTF Investments, LLC and their Financial Advisers is available via the SEC's website www.adviserinfo.sec.gov.

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Item 4 – Services, Fees and Compensation

Firm Overview

KTF Investments (hereinafter referred to as "KTF" or "firm"). KTF submitted its registration to become an independent investment advisory firm July 9, 2025. The firm is principally owned by Josh Axel, Jess Sansone and Melissa Godinez. KTF has an office located 13001 Seal Beach Blvd, #250, Seal Beach, California. Additional information about KTF's direct owners and executive officers may be found in Form ADV Part 1, Schedule A available at adviserinfo.sec.gov by searching KTF Investments name or using KTF's CRD #337465.

Types of Advisory Services

KTF manages assets for many different types of clients, discretionary and non-discretionary, to help meet their financial goals while remaining sensitive to risk tolerance and time horizons. As a fiduciary, it is the firm's duty to always act in the client's best interest. This is accomplished in part by knowing the client. KTF has established a service-oriented advisory practice with open lines of communication. Working with clients to understand their investment objectives while educating them about the firm's process facilitates the kind of working relationship we value.

KTF Investments sponsors a Wrap Program and offers its investment advisory services through that program. KTF's wrap fee program allows clients to pay a single fee for investment advisory services and associated custodial transaction costs. By participating in a wrap fee program, clients may end up paying more or less than in a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to the client by the executing broker.

Our Wrap Advisory Services

- **Wrap Program:** KTF provides the wrap advisory services based on each individual client's financial circumstances and investment objectives. KTF meets with each client to discuss their current financial conditions and to review their current investment holdings. Based upon each client's circumstances, KTF will determine an appropriate asset allocation for the client's investment portfolio or sub-advisors to implement an agreed allocation, in accordance with the client's specific financial objectives and risk tolerance and in consideration of other factors, including the client's time horizon (education funding, home purchase, retirement, legacy planning), liquidity needs, and other available resources (including external retirement plans, projected social security, outside investments, real estate, and insurance). Each client's financial objectives, risk tolerance, and liquidity needs, along with a recommended asset allocation, are incorporated into their ongoing investment strategy.

- **Fee Schedule:** The maximum annual fee charged for this service will not exceed 2%. Fees to be assessed will be outlined in the advisory agreement to be signed by the Client. KTF's general policy is to charge fees in accordance with the fee schedule in effect at the time of the charge, however, all fees are subject to negotiation. Fees will typically be deducted from client account(s). As part of this process, Clients understand the following:
    - The client's custodian sends statements at least quarterly showing the market values for each security included in the Assets and all account disbursements, including the amount of the advisory fees paid to our firm;
    - Clients will provide authorization permitting our firm to be directly paid by these terms. Our firm will send an invoice directly to the custodian; and
    - If our firm sends a copy of our invoice to the client, a legend urging the comparison of information provided in our statement with those from the qualified custodian will be included.

  For the sub-advisory services rendered to our clients, KTF compensates third party investment advisory firms a percentage of the overall investment advisory fee charged by our firm.

  Please note, KTF does not charge its clients higher advisory fees based on their trading activity. Nonetheless, you should be aware that KTF has an incentive to limit our trading activities in your account because we are charged for executed trades.

- **Other Types of Fees & Expenses:** The fees not included in the advisory fee for our wrap services are charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, wire transfer fees, fees for trades executed from custodian, and other fees and taxes on brokerage accounts and securities transactions.

Wrap Fee Program Recommendation: The firm may receive more compensation from the client's participation in our wrap fee program than if the client purchased our investment advisory services separately. Consequently, KTF may have an incentive to recommend that a client participate in a wrap fee program and open accounts with Schwab. That incentive may be based on the firm's interest in receiving the products and services rather than based on the client's interest in having the most appropriate fee arrangement for the firm's investment advisory services and the best value in custody services and the most favorable execution of client transaction. KTF believes, however, that the recommendation to the wrap fee program (including the use of Schwab as custodian and broker) is in the best interests of those clients to whom KTF recommends it based on (a) an assessment of their investment objectives, financial situation, the firm's investment plans, and anticipated trading activity in their accounts and all other relevant factors, and

(b) the scope, quality, and price of Schwab services. It is not based on Schwab payment for third party services that benefit only us.

Schwab's Brokerage Services: In addition to the advisory services, the wrap fee program includes certain brokerage services of Charles Schwab & Co., Inc. ("Schwab") a broker-dealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. We are independently owned and operated and not affiliated with Schwab. Schwab will act solely as a broker-dealer and not as an investment advisor to you. Schwab will have no discretion over your account and will act solely on instructions it receives from us [or you]. Schwab has no responsibility for our services and undertakes no duty to you to monitor our firm's management of your account or other services we provide to you. Schwab will hold your assets in a brokerage account and buy and sell securities and execute other transactions when we [or you] instruct them to. We do not open the account for you.

Fees We Pay Schwab: In addition to compensating KTF for advisory services, the wrap fee you pay KTF allows us to pay for brokerage and execution services provided by Schwab.

- KTF pays Schwab a single asset-based fee in lieu of transaction-based commissions. The fees we pay Schwab are assessed on certain assets in your account(s) at Schwab. We have a conflict of interest because we have a financial incentive to maximize our compensation by seeking to reduce or minimize the total costs incurred in your account(s) subject to a wrap fee.

Our wrap fee does not include the fees and costs listed below. The fees and costs may apply to transactions in your account. The fees and costs not included in the wrap fee that you will pay include:

- Commissions and other fees charged by broker-dealers other than Schwab for transactions in your account if KTF uses Schwab's Prime Brokerage or Trade Away Services. Because you will pay our wrap fee in addition to any charges paid to broker-dealers other than Schwab, we have an incentive to execute transactions for your account through Schwab.

Assets Under Management: As of December 31, 2025 total assets under management were $700,182,535 ($646,471,241 on a discretionary basis plus $53,711,294 on a nondiscretionary basis).

Item 5 – Account Requirements & Types of Clients

KTF provides financial planning and portfolio management services to individuals, high net individuals, Defined benefit plans and profit-sharing plans.

KTF generally requires a minimum account size of one million dollars to open a portfolio.

Item 6 – Portfolio Manager Selection & Evaluation

Selection of Portfolio Managers

KTF's financial advisors act as portfolio managers for this wrap fee program. A conflict arises in that other investment advisory firms may charge the same or lower fees than our firm for similar services. Our financial advisors are often subject to individual licensing requirements as imposed by state securities boards. Where applicable, our firm is required to confirm or update each financial advisor's Form U4 on an annual basis. Supervision of the firm's advisory activities is conducted by senior management personnel and the firm's compliance committee which includesits Chief Compliance Officer.

Advisory Business

Information about KTF's wrap fee services can be found in Item 4 of this brochure. KTF offers individualized investment advice to our Wrap Program clients.

Each Wrap Program client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account.

Participation in Wrap Fee Programs

KTF only offers wrap fee accounts to our clients, which are managed on an individualized basis according to the client's investment objectives, financial goals, risk tolerance, etc.

Performance-Based Fees & Side-By-Side Management

Our firm does not charge performance-based fees.

Methods of Analysis, Investment Strategies & Risk of Loss

When providing management and consulting services, KTF relies upon general securities and market knowledge, published investment strategies, and general sources of securities and market information. The firm makes recommendations relaying to various investment asset types it believes will meet a client's individualized needs. KTF assists each client in tailoring their long-term investment goals that are representative and suitable to their personal situation. The tailored investment strategy will also be diversified in order to mitigate investment risks.

KTF uses the following strategies in managing client accounts:

Investment strategies KTF managers utilize are based on the client's needs and goals and are typically related to growth, value, portfolio balance, income, and indexing. Portfolio strategies are managed to the risk profiles of our clients which may involve rebalancing from time to time. Rebalancing may increase a client's tax obligations.

Investment returns are not guaranteed. While investing in securities, KTF's clients may lose money on their investments. The firm works with their clients to help understand their tolerance for risk. KTF feels that asset allocation or the process of diversifying money across different asset classes generally maximizes return and minimizes risk. Asset allocation does not ensure a profit or guarantee against loss but rather serves as a method to help manage investment risk. Investing in securities involves risk including a complete risk of loss that clients should be prepared to bear.

Voting Client Securities

As a policy and following KTF's Investment Management Agreement, KTF votes proxies related to securities held in certain Client accounts. We have engaged the services of Broadridge Investor Communication Solutions Inc. to provide an internet-based proxy voting platform. We have established voting guidelines to assure Client proxies are voted properly and in the best interests of Clients. Clients may contact KTF with questions pertaining to proxy procedures and proposals.

Each Client acknowledges that KTF may delegate the authority to vote proxies, including on matters relating to class actions, bankruptcies or reorganizations, to independent managers and unaffiliated investment managers that are selected by KTF and delegated discretionary investment authority to manage a portion of the Client's assets. In such circumstances, proxy voting will be governed by each such manager's proxy voting policies and procedures.

Item 7 – Client Information Provided to Portfolio Managers

KTF's financial advisors work with clients directly to understand their current financial situation, existing resources, financial goals, and tolerance for risk. The firm urges clients to communicate any significant changes to their financial or personal circumstances, so the firm can consider such information in managing their investments. Please see the firm's Privacy Policy for more information on how the firm utilizes client information.

Item 8 – Client Contact with Portfolio Managers

Clients are welcome to bring any questions or concerns about the management of their portfolios to our firm. At the client's request, and typically no less than annually, KTF portfolio managers meet with their clients and review their accounts.

Where appropriate, KTF may combine the mailing of client statements and other client correspondence and information for accounts that have a common address (householding). Client may revoke client's consent at any time by contacting KTF in writing. If client chooses to revoke client's consent, KTF will begin sending separate mailings within 30 days after receiving notice of revocation.

In addition, from time to time, Adviser may be required to deliver certain documents to the client. Client, to the extent that client has email capability and/or web access, hereby consents to the Adviser's use of electronic means, such as email, to make delivery of required and other documents. This delivery may include notification of the availability of such document(s) on a website, and client agrees that such notification will constitute "delivery." In conjunction with the investment advisory agreement, the client will provide KTF with the client's email address and keep this information current at all times by promptly notifying KTF of any change in email address.

Item 9 – Additional Information

Disciplinary Information

There are no legal or disciplinary events that are material to the evaluation of our advisory business or the integrity of our management.

Financial Industry Activities & Affiliations

KTF does not have any financial activities or affiliations at this time.

Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

KTF has adopted a Code of Ethics that will apply to all of the Firm's supervised persons and sets forth the standard of conduct by which each individual should carry out his/her respective obligations. Specifically, this document presents the Firm's fundamental standard of conduct and shall address issues pertaining to:

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

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

Subject to satisfying this policy and applicable laws, officers, directors and employees of KTF may trade for their own accounts in securities which are recommended to and/or purchased for KTF's clients. The Code of Ethics is designed to assure that the personal securities

transactions, activities and other interests of the employees of KTF will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of KTF's clients. In addition, the Code requires pre-clearance of many transactions and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between KTF and its clients. KTF's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting its Chief Compliance Officer.

Brokerage Practices and Soft Dollars

Consistent with obtaining best execution for clients, KTF directs certain brokerage transactions for client portfolios to brokers (like Schwab) who provide various services to KTF and, indirectly, to its clients. These services are based on the safe harbor requirements of Section 28(e) of the Securities Exchange Act of 1934 and are designed to augment our own internal research, investment strategy, and other firm capabilities. Among the services KTF receives from Schwab, if an account is transitioned from another broker-dealer/custodian to Schwab for execution and/or custodial services, KTF may receive reimbursement from Schwab to cover the expenses related to facilitating this transition.

Review of Accounts

KTF reviews client portfolio accounts on a quarterly basis through the use of portfolio accounting software to monitor allocations.

Other Compensation:

The firm pays Schwab certain other fees that it would otherwise charge to clients. These fees may include (a) flat dollar per trade fees for Schwab prime brokerage and trade away services (through which the firm can have trades for client accounts at Schwab executed by broker-dealers other than Schwab), (b) transaction-based fees imposed on Schwab by regulatory organizations and exchanges and fees to offset processing costs incurred by Schwab for the exchange of securities for equity, options or other covered security sell transaction, and (c) short-term redemption fees on no-transaction-fee mutual funds.

Products & Services Available from Schwab

Schwab is in the business serving independent investment advisory firms like KTF. They provide the firm and clients with access to its institutional brokerage – 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

manage or administer client accounts while others help manage and grow KTF's business. Schwab support services are generally available on an unsolicited basis and at no charge. The availability to KTF of Schwab products and services is not based on giving particular investment advice, such as buying particular securities for our clients. A more detailed description of Schwab support services follows:

- **Services that Benefit Clients:** Schwab institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. Schwab may also aid in the payment of fees associated with the custodial transfer. The investment products available through Schwab include some to which the firm might not otherwise have access to or that would require a significantly higher minimum initial investment by firm clients. Schwab services described in this paragraph generally benefit clients and their accounts.

- **Services that May Not Directly Benefit Clients:** Schwab also makes available other products and services benefiting our firm but may not directly benefit clients or their accounts. These products and services assist in managing and administering our client accounts. They include investment research, both Schwab and that of third parties. This research may be used to service all or some substantial number of client accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:
    - provides access to client account data (such as duplicate trade confirmations and account statements);
    - facilitates trade execution and allocate aggregated trade orders for multiple client accounts;
    - provides pricing and other market data;
    - facilitates payment of our fees from our clients' accounts; and
    - assists with back-office functions, recordkeeping and client reporting.

- **Services that Generally Benefit Only Our Firm:** Schwab also offers other services intended to help manage and further develop our business enterprise. These services include:
    - marketing, educational conferences and events;
    - technology, compliance, legal, and business consulting;
    - publications and conferences on practice management and business succession; and
    - access to employee benefits providers, human capital consultants, and insurance providers.

  Schwab may provide some of these services itself. In other cases, Schwab will arrange for third-party vendors to provide the services to the firm. Schwab may also discount or waive fees for some of these services or pay all or a part of a third party's fees. Schwab may also

provide the firm with other benefits such as occasional business entertainment for our personnel.

Irrespective of direct or indirect benefits to the firm's client through Schwab, KTF strives to enhance the client experience, help clients reach their goals, and put client interests before that of our firm or associated persons.

- **Our Interest in Schwab Services:** The availability of these services from Schwab benefits the firm because KTF does not have to produce or purchase them directly. These services are not contingent upon committing any specific amount of business to Schwab in trading commissions or assets in custody. This arrangement may serve as an incentive to recommend clients maintain their account with Schwab based on interest in receiving Schwab services benefiting KTF rather than based on the client's interest in receiving the best value in custody services and the most favorable execution of transactions. This is a potential conflict of interest. KTF believes, however, that the selection of Schwab as custodian and broker is in the best interests of the clients. It is primarily supported by the scope, quality and price of Schwab services and not Schwab services that benefit only the firm.

  As a matter of firm practice, KTF does not pay referral fees to affiliated or independent persons or firms ("Solicitors") for introducing certain clients to us.

  We do not maintain physical custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account. Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We typically have limited trading authority over client account(s). We may determine both the amount and the type of securities to be bought or sold. The client signs a limited power of attorney to allow us this trading authority.

  We recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. Conflicts of interest associated with this arrangement are described below as well as in Item 14 (Client referrals and other compensation). You should consider these conflicts of interest when selecting your custodian.

  We do not open the account for you, although we may assist you in doing so. Not all advisors require their clients to use a particular broker-dealer or other custodian selected

by the advisor. Even though your account is maintained at Schwab, and we anticipate that most trades will be executed through Schwab, we can still use other brokers to execute trades for your account as described below (see "Your brokerage and custody costs").

How We Select Brokers/Custodians

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared with other available providers and their services. We consider a wide range of factors, including these: Combination of transaction execution services along with asset custody services (generally without a separate fee for custody)

- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- Reputation, financial strength, security and stability
- Services delivered or paid for by Schwab
- Their prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below. See “Products and services available to us from Schwab”

Your brokerage and custody costs

For our clients’ accounts that Schwab maintains, Schwab generally does not charge separately for custody services but is compensated by charging commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, mutual funds and ETFs) do not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. For some accounts, Schwab charges a percentage of the dollar amount of assets in the account in lieu of commissions. In addition to commissions and asset-based fees, Schwab charges a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation paid

to the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. Although we are not required to execute all trades through Schwab, we have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above. By using another broker or dealer, you may pay lower transaction costs.

Client Referrals

KTF does not directly or indirectly compensate any person for client referrals who is not advisory personnel for the firm.

Financial Information

KTF does not solicit fees of more than $1,200 per client, six months or more in advance. KTF is unaware of any financial condition that is reasonably likely to impair its ability to meet contractual commitments relating to its discretionary authority over certain client accounts.

KTF has not been the subject of a bankruptcy proceeding.