Form ADV Part 2A: Firm Brochure

March 2022

IRON Financial LLC

630 Dundee Road Suite 200
Northbrook, IL 60062

Telephone: 847-715-3200
Contact email: tim.ziemba@ironfinancial.com
Website: www.ironfinancial.com

This brochure provides information about the qualifications and business practices of IRON Financial, LLC. If you have any questions about the contents of this brochure, please contact us at 847-715-3200 or tim.ziemba@ironfinancial.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority and registration with the United States Securities and Exchange Commission and does not imply a certain level of skill or training.

Additional information about IRON Financial, LLC is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 106682.

Item 2 – Material Changes

March 2022 update

The IRON Income & Growth Portfolio was introduced January 1, 2022. Additional information can be found in Items 4 and 5 of this document.

The maximum fee for the IRON Incertus Portfolios was reduced from 0.70% annually to 0.59% annually. Please see Item 5 for details on how fees are calculated.

March 2021 update

Effective January 1, 2021, the ERISA 3(38) and 3(21) fiduciary services group of IRON Financial, LLC ("IRON") has been acquired by Creative Planning, LLC ("Creative Planning"), a leading U.S. wealth management firm and registered investment advisor. Under the terms of the agreement between IRON and Creative Planning, Creative Planning has purchased substantially all of the assets of IRON's Corporate Retirement / ERISA fiduciary business. IRON no longer offers ERISA 3(38) and 3(21) fiduciary services.

This acquisition does not impact any of IRON's other Investment Management Services.

As of December 31, 2020, Richard Friedman, Steven Weil, and Ramesh Poola are no longer employed at IRON. Richard Friedman, Steven Weil, and Ramesh Poola have joined Creative Planning, as planned, during the above referenced acquisition. Additionally, Richard Lakin, Richard Friedman, Steven Weil, Ted Connolly, and Ramesh Poola no longer have ownership in IRON Holdings, LLC, or any of its affiliates.

The following changes were made to this firm brochure:

Deleted all references to the business of IRON Corporate Retirement Services / IRON ERISA Investment Fiduciary Services

Added new strategies IRON Incertus Portfolio and IRON High-Quality Equity Portfolio

Deleted all references to Automated Advisory Services

Deleted all references to the IRON Strategic Income Fund

Deleted references to Pension Consulting Firm

Item 3 – Table of Contents

Item 1 – Cover Page ... 1

Item 2 – Material Changes ... 2

Item 3 – Table of Contents ... 3

Item 4 – Advisory Business ... 4

Item 5 – Fees and Compensation ... 5

Item 6 – Performance-Based Fees and Side-By-Side Management ... 8

Item 7 – Types of Clients ... 8

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

Item 9 – Disciplinary Information ... 11

Item 10 – Other Financial Industry Activities and Affiliations ... 11

Item 11 – Code of Ethics, Participation or Interest in Client Transactions & Personal Trading ... 11

Item 12 – Brokerage Practices ... 12

Item 13 – Review of Accounts ... 14

Item 14 – Client Referrals and Other Compensation ... 14

Item 15 – Custody ... 16

Item 16 – Investment Discretion ... 16

Item 17 – Voting Client Securities ... 17

Item 18 – Financial Information ... 17

Part 2B of Form ADV: Brochure Supplement ... 18

Item 4 – Advisory Business

IRON Financial, LLC (“IRON”, “we”, “us”) is an SEC-registered investment advisor with its principal place of business located in Illinois. IRON Financial, LLC began conducting business in 1994. Listed below, are the firm's principal shareholders (i.e., those individuals and entities controlling 25% or more of this company).

IRON Holdings, LLC, Holding Company

IRON Financial, LLC also provides the advisory services described below under the following names: IRON Asset Management, IRON Financial, LLC.

We offer the following advisory services to our clients:

PORTFOLIO MANAGEMENT

IRON Financial, LLC is dedicated to providing high quality strategies in fixed income, equity, and alternative investment marketplaces. Leveraging our expertise in the primary and secondary capital markets, and quantitative and qualitative proprietary processes, IRON strives to deliver strategies and managed solutions that meet the needs and exceed the expectations of sophisticated investors.

We provide the following discretionary investment management services:

Fixed Income Portfolios:

IRON’s fixed income portfolios are designed for strategic allocation to the fixed income asset class on a long-term basis. Our portfolio managers use their experience and expertise in the fixed income capital markets to create strategies and build and manage diversified portfolios that match clients’ goals and objectives, guided by these principles:

1. Eliminate conflicts of interest and provide complete transparency via a fee-only pricing model.

2. Identify the soundest long-term investment opportunities in the marketplace, then construct a portfolio that enables the discerning advisor and long-term investor to capitalize on the opportunities.

3. Focus on principal preservation and avoid adding incremental risk by “chasing” return.

IRON Income & Growth Portfolio:

The IRON Income & Growth Portfolio offers diverse exposure to income-generating securities across asset classes and geographic boundaries. These include equities, investment grade debt, high yield debt, preferred stock, convertible bonds, REITs (real estate investment trusts), and TIPS (treasury inflation-protected securities). The portfolio’s primary goals are to generate income and growth. The secondary goal is protection of principal.

IRON Incertus Portfolio:

The IRON Incertus Portfolio offers an actively managed diversified asset-class exposure to global equities, bonds, commodities, and inflation-protected securities. The strategy’s objective is to outperform a moderate target risk index, while delivering lower drawdown. IRON runs two variants of the strategy; to comprise the equity allocation, one variant utilizes individual stock positions while the other utilizes exchange traded funds (ETFs).

IRON High-Quality Equity Portfolio:

The IRON High-Quality Equity Portfolio (“High-Q”) is a large capitalization, actively managed, minimum variance equity strategy that seeks to generate capital growth with minimum volatility in every market environment. It strives to maintain a broadly diversified, optimally weighted exposure to mid and large market-cap stocks, with the potential for capital growth. This is pursued by identifying high quality firms with improving operating and long-term earnings potential characteristics. The overall goal of the strategy is to generate S&P 500 Index like returns, but with lower volatility and greater consistency in both up and down markets.

IRON S&P 500 Equity Plus Strategy:

The IRON S&P 500 Equity Plus strategy is designed to maximize distribution income and total return on the investor’s exposure to the S&P 500 index by opportunistically writing and actively managing options. The strategy’s objective is to provide superior risk-adjusted total returns relative to the CBOE S&P 500 BuyWrite Index (BXM).

IRON Core Plus Portfolios:

IRON designs these portfolios to fit the needs of individual investors across a wide spectrum of circumstances and investment profiles. Each portfolio is structured to meet both the selection criteria of our investment team and the risk tolerance of individual investors (conservative, aggressive, or somewhere in between).

We have determined an array of investment styles and investor profiles, and we continuously select the investments and allocations that align with a range of circumstances and risk tolerances. The client selects the portfolio that best suits their needs and preferences. IRON’s Core Plus Portfolios are designed using equity exposure, fixed income exposure, or various combinations of both.

IRON REIT Strategy:

The IRON Real Estate Investment Trust (“REIT”) Strategy aims to generate superior risk-adjusted total return relative to the Equity REIT index by creating and managing a portfolio of publicly traded Equity REITs.

We have no financial affiliation with any brokerage firm. IRON will not receive commissions or other forms of compensation for client account transactions from anyone. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Our investment recommendations are not limited to any specific product or service offered by any broker-dealer or insurance company. Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity, and suitability.

AMOUNT OF MANAGED ASSETS

As of December 31, 2021, IRON had the following amount of assets under management:

	Assets Under Management	Number of Clients
Discretionary	$449,097,026	304
Non-Discretionary	$0	0
Managed Assets Total	$449,097,026	304

Item 5 – Fees and Compensation

PORTFOLIO MANAGEMENT FEES

Fees for management services will be a percentage of assets under management.

Fixed Income Portfolios are charged a maximum annual fee of 0.35% of assets under management. These accounts have a minimum fee of $50 per quarter. An initial minimum of $300,000 is required for accounts utilizing traditional fixed income issues. The initial minimum for accounts utilizing fixed income ETF securities is $10,000.

IRON Income & Growth Portfolios are charged a maximum annual fee of 0.35% of assets under management. These accounts have a minimum fee of $50 per quarter. An initial minimum of $5,000 is required for this service.

IRON Incertus Portfolios are charged a maximum annual fee of 0.59% of assets under management. These accounts have a minimum fee of $50 per quarter. An initial minimum of $250,000 is required for accounts utilizing individual stocks to comprise the equity allocation. For accounts utilizing ETF securities to comprise the equity allocation, the initial minimum is $10,000.

IRON High-Quality Equity Portfolios are charged a maximum annual fee of 0.70% of assets under management. These accounts have a minimum fee of $50 per quarter. An initial minimum of $250,000 is required for this service.

IRON S&P 500 Equity Plus Strategy portfolios are charged a maximum annual fee of 0.50% of assets under management. These accounts have a minimum fee of $50 per quarter. An initial minimum of $100,000 is required for this service.

IRON Core Plus Portfolios are charged a maximum annual fee of 0.50% of assets under management. These accounts have a minimum fee of $50 per quarter. An initial minimum of $10,000 is required for this service.

IRON REIT Strategy portfolios are charged a maximum annual fee of 0.70% of assets under management. These accounts have a minimum fee of $50 per quarter. An initial minimum of $100,000 is required for this service.

Unless otherwise noted, the minimum portfolio size is $100,000.

With the exception of business conducted through Amplify, which runs a turnkey asset management program (TAMP), and whose details are described below, our fees are billed in arrears at the end of each calendar quarter based upon the value (market value or fair market value in the absence of market value), of the client's account at the end of the previous quarter. Quarterly fees are calculated by taking the annual billing percent, multiplying it by the month ending balance at the end of the billing period and dividing the total by 4. All fees are prorated for contributions and withdrawals during the billing period. Fees will be debited from the client’s custodial account unless otherwise agreed to in writing. Sub Advised accounts may be billed in a different manner.

We may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

For assets managed within IRON’s proprietary strategies but through the above-mentioned Amplify platform, Amplify assesses fees in advance following each calendar quarter, and those fees are ultimately calculated using Average Daily Balance. These fees are initially calculated using the market value of assets on the last day of the previous quarter, multiplying it by the annual management fee, and dividing by 4. A true-up is then calculated and assessed in the following quarter’s billing cycle.

LIMITED NEGOTIABILITY OF ADVISORY FEES

We retain the discretion to negotiate alternative fees and minimums on a client-by-client basis. We may offer discounts to family members and friends of associated persons of our firm.

TERMINATION OF THE ADVISORY RELATIONSHIP

A client agreement may be canceled at any time, by either party, for any reason upon receipt of 5 days written notice. Upon termination of any account, any earned but unpaid fees will be due and payable to IRON.

MUTUAL FUND AND ETF FEES

All fees clients pay us for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge.

A client could invest in a mutual fund or ETF directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

WRAP FEE PROGRAMS AND SEPARATELY MANAGED ACCOUNT FEE*S*

Clients participating in separately managed account programs may be charged various program fees in addition to the advisory fee charged by our firm. Such fees may include the investment advisory fees of the independent advisors, which may be charged as part of a wrap fee arrangement. In a wrap fee arrangement, clients pay a single fee for advisory, brokerage, and custodial services. Client’s portfolio transactions may be executed without commission charge in a wrap fee arrangement. In evaluating such an arrangement, the client should also consider that, depending upon the level of the wrap fee charged by the broker-dealer, the amount of portfolio activity in the client’s account, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately. We will review with clients any separate program fees that may be charged to clients.

Discretionary Manager for Wrap Programs (Wrap Clients):

IRON may serve as a Portfolio Manager in wrap fee programs. While we attempt to manage the Wrap Clients similarly to our other clients, the presence of the Wrap Sponsor effectively limits our control in doing so. Wrap Programs are arrangements in which investment advisory services, brokerage execution services, and custody are provided by a sponsor for a single predetermined wrap fee (regardless of the number of trades completed by a Wrap Client). Generally, clients participating in a wrap program pay a single, all-inclusive fee to the Program Sponsor, based on the assets under management. IRON receives from the Program Sponsor a portion of the wrap fee for the portfolio management services it provides. The Wrap Sponsor has prepared a brochure which contains detailed information about its wrap program, including the wrap fee charged. Copies of the brochure are available from the Program Sponsor upon request. Wrap Clients should be aware that IRON will not be provided with sufficient information to perform an assessment as to the suitability of services for the Wrap Client. IRON relies on the Wrap Sponsor to determine not only the suitability of the services for the client but also the suitability of the wrap fee programs for the client. IRON does not serve as a sponsor to any wrap or similar managed account programs.

Fees and Compensation – Wrap Clients:

The fee received by IRON is calculated as a fixed percentage of the assets under management within the

Wrap Program. The range of fees is from 0.325% to 0.70% annually. Please see the Wrap Sponsor's ADV Part 2 for a description of total fees paid by the Wrap Client to the Wrap Sponsor.

ADDITIONAL FEES AND EXPENSES

In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker-dealers, including, but not limited to, any transaction charges imposed by a broker-dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the Brokerage Practices (Item 12) of this brochure for additional information.

ADVISORY FEES IN GENERAL

Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisors for similar or lower fees.

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

We do not charge performance-based fees.

Item 7 – Types of Clients

We provide advisory services to the following types of clients:

1. Individuals (other than high net worth individuals)
2. High net worth individuals
3. Charitable organizations
4. Corporations or other businesses not listed above

As previously disclosed in Fees and Compensation (Item 5), we have established certain initial minimum account requirements, based on the nature of the service(s) being provided. For a more detailed understanding of those requirements, please review the disclosures provided in each applicable service.

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

METHODS OF ANALYSIS

We use the following methods of analysis in formulating our investment advice and/or managing client's assets:

Charting:

In this type of technical analysis, we review charts of market and security activity in an attempt to identify when the market is moving up or down. This may help us determine when and how long the trend may last and when that trend might reverse.

Fundamental Analysis:

We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis:

We analyze past market movements and apply that analysis to the present to recognize recurring patterns of investor behavior and potentially predict future price movement. Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly managed or financially unsound company may underperform regardless of market movement.

Quantitative Analysis:

Quantitative methods include analysis of historical data such as price and volume statistics, performance data, standard deviation, and related risk metrics, how the security performs relative to the overall stock market, earnings data, price to earnings ratios, and related data.

Risks for all forms of analysis:

Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

We use the following strategy(ies) in managing clients' accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term purchases:

We purchase securities with the idea of holding them in the client's account for a year or longer. Typically, we employ this strategy when:

1. We believe the securities to be currently undervalued, and/or

2. We want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Short-term purchases:

When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

A short-term purchase strategy poses risks should the anticipated price swing not materialize; we are then left with the option of having a long-term investment in a security that was designed to be a short-term purchase, or potentially taking a loss.

In addition, this strategy involves more frequent trading than does a longer-term strategy and will result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

Trading:

We purchase securities with the idea of selling them very quickly (typically within 30 days or less). We do this in an attempt to take advantage of brief price swings.

Utilizing a trading strategy creates the potential for sudden losses if the anticipated price swing does not materialize. Moreover, under those circumstances, we are left with few options:

1. Having a long-term investment in a security that was designed to be a short-term purchase, or

2. The potential of having to take a loss.

In addition, because this strategy involves more frequent trading than does a longer-term strategy, there will be a resultant increase in brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

Margin transactions:

We may purchase securities for your portfolio with money borrowed from your brokerage account. This allows you to purchase more stock than you would be able to with your available cash and allows us to purchase stock without selling other holdings.

A risk in margin trading is that, in volatile markets, securities prices can fall very quickly. If the value of the securities in your account minus what you owe the broker falls below a certain level, the broker will issue a “margin call,” and you will be required to sell your position in the security purchased on margin or add more cash to the account. In some circumstances, you may lose more money than you originally invested.

Option writing:

We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative because it derives its value from an underlying asset.

The two types of options are calls and puts:

1. A call gives the holder the right to buy an asset at a certain price within a specific period of time. We will buy a call if we have determined that the stock will increase substantially before the option expires.

2. A put gives the holder the right to sell an asset at a certain price within a specific period of time. We will buy a put if we have determined that the price of the stock will fall before the option expires. We use "covered calls", in which we sell an option on a security you own. In this strategy, you receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price and date.

A risk of covered calls is that the option buyer does not have to exercise the option, so that if we want to sell the stock prior to the end of the option agreement, we have to buy the option back from the option buyer, for a possible loss.

Risk of Loss:

Securities investments are not guaranteed, and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

Item 9 – Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

None

Item 11 – Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Our firm and our personnel owe a duty of loyalty, fairness, and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports, as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering ("IPO"). Our Code of Ethics also provides for oversight, enforcement, and recordkeeping provisions.

Our Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to tim.ziemba@ironfinancial.com or by calling us at 847-715-3200.

Our firm and individuals associated with our firm are prohibited from engaging in principal transactions and agency-cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees 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.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts' securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is the express policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory client account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

IRON may aggregate our employee trades with client transactions where possible and when compliant with our duty to seek best execution for our clients. In these instances, participating clients will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. In the instances where there is a partial fill of a particular batched order, we will allocate all purchases pro-rata, with each account paying the average price. Our employee accounts will be included in the pro-rata allocation.

As these situations represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm may put his or her own interest above the interest of an advisory client.

2. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.

Our firm requires prior approval for any IPO or private placement investments by access or access related persons of the firm.

IRON may maintain a list of all reportable securities holdings for our firm and anyone associated with this advisory practice that has access to advisory recommendations. These holdings are reviewed on a regular basis by our firm's Chief Compliance Officer. We have established procedures for the maintenance of all required books and records.

All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.

IRON requires delivery to and acknowledgment of the Code of Ethics by each supervised person of our firm annually.

IRON has established policies requiring the reporting of Code of Ethics violations to our senior management team.

Any individual who violates any of the above restrictions may be subject to termination.

Item 12 – Brokerage Practices

We will block trades where possible and when advantageous to clients. The blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts, so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block.

Block trading may allow us to execute equity trades in a timelier, more equitable manner, and at an average share price. We will typically aggregate trades among clients whose accounts can be traded at a given broker, and generally will rotate or vary the order of brokers through which we place trades for clients on any particular day. If we are unable to aggregate trades due to the fact that client accounts are on different platforms, we will seek to execute the trades in a manner so that one platform is not favored over another.

We may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although we may recommend that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. We are independently owned and operated and not affiliated with Schwab.

Schwab provides us with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least $10 million of the advisor's clients' assets are maintained in accounts at Schwab Institutional. These services are not contingent upon our committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes available to us other products and services that benefit us but may not directly benefit clients' accounts. Many of these products and services may be used to service all or some substantial number of our accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist us in managing and administering clients' accounts include software and other technology that: (i) provide access to client account data (such as trade confirmations and account statements): (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of our fees from clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services intended to help us manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us. Schwab Institutional may also provide other benefits such as: educational events or occasional business entertainment for our personnel. In evaluating whether to recommend a client custody their assets at Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

We may recommend that clients establish brokerage accounts with TD Ameritrade Institutional ("TD Ameritrade"), a division of a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although we may recommend that clients establish accounts at TD Ameritrade, it is the client's decision to custody assets with TD Ameritrade. We are independently owned and operated and not affiliated with TD Ameritrade.

IRON participates in the institutional advisor program ("Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC, an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include: custody of securities, trade execution, clearance, and settlement of transactions. IRON receives some benefits from TD Ameritrade through its participation in the Program. Please refer to the Client Referrals and Other Compensation (Item 14) of this brochure for additional information.

There is no direct link between our firm's participation in the Program and the investment advice we give to our clients, although we receive economic benefits through our 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): duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Program 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; access to institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services offered to Program participants by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by IRON and may also pay for or reimburse expenses (including travel, lodging, meals, and entertainment expenses) for our personnel to attend conferences or meetings relating to the Program or to TD Ameritrade's advisor custody and brokerage services generally.

Some of the products and services made available by TD Ameritrade through the Program may benefit IRON but may not benefit IRON's clients' accounts. These products or services may assist IRON in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help IRON manage and further develop its business enterprise. The benefits received by the IRON or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by IRON or its related persons in and of itself creates a potential conflict of interest and may indirectly influence our recommendation of TD Ameritrade for custody and brokerage services.

Item 13 – Review of Accounts

REVIEWS

While the underlying securities within Individual Portfolio Management Services accounts are monitored, these accounts are reviewed at least annually. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. Accounts will generally be rebalanced as asset allocation drifts from the target determined by the client's risk tolerance, stated wishes, and agreed upon investment strategy, though this may be subject to client approval where rebalancing would trigger material tax consequences. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political, or economic environment.

REPORTS

In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, upon request we provide reports summarizing account performance, balances, transactions, and/or holdings.

Item 14 – Client Referrals and Other Compensation

CLIENT REFERRALS

Our firm may pay referral fees to independent persons or firms ("Solicitors") for introducing clients to us. Whenever we pay a referral fee, we require the Solicitor to provide the prospective client with a copy of this brochure and a separate disclosure statement that includes the following information:

1. The Solicitor's name and relationship with our firm;

2. The fact that the Solicitor is being paid a referral fee;

3. The amount of the referral fee; and

4. Whether the referral fee paid to us by the client will be increased above our normal fees in order to compensate the Solicitor.

The compensation we pay to those persons who may solicit or refer clients to us may be either a one-time referral or a percentage of the advisory fees we earn for the management of the referred client's account.

The ongoing compensation may range from 15% to 50% of the advisory fees earned depending on the particular circumstances of the relationship. The on-going compensation will continue to be paid for so long as the referred client remains our advisory client.

As disclosed under Item 12 above, IRON participates in TD Ameritrade's institutional customer program and IRON may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between IRON's participation in the program and the investment advice it gives to its clients, although IRON 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; 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 institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to advisors by third party vendors. TD Ameritrade may also pay for business consulting and professional services provided to advisors such as IRON. These products or services may assist IRON in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help IRON manage and further develop its business enterprise. The benefits received by IRON or its personnel through participation in the program do not depend on the amount or number of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duty to clients, IRON endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by IRON or its personnel in and of itself creates a potential conflict of interest and may indirectly influence IRON's choice of TD Ameritrade for custody and brokerage services.

IRON has received client referrals from TD Ameritrade through its past participation in TD Ameritrade's AdvisorDirect referral program. TD Ameritrade is a broker-dealer independent of and unaffiliated with IRON, and there is no employee or agency relationship between them. TD Ameritrade established AdvisorDirect as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD Ameritrade does not supervise IRON and has no responsibility for IRON's management of client portfolios or IRON's other advice or services. IRON pays TD Ameritrade an ongoing fee for each successful client referral. For referrals that occurred via AdvisorDirect before April 10, 2017, this fee is a percentage (not to exceed 25%) of the advisory fee that the client pays to IRON ("Solicitation Fee"). For referrals that occurred via AdvisorDirect on or after April 10, 2017 the Solicitation Fee is tiered. The tiers are dependent on the amount of referred client assets and does not exceed 0.25% of managed assets annually unless such client assets are subject to a Special Services Addendum. In the case of a Special Services Addendum, the Solicitation Fee is 25% of the advisory fee that the client pays to IRON. IRON will also pay TD Ameritrade the Solicitation Fee on any assets managed by IRON for any of a referred client's family members, including a spouse, child, or any immediate family member who resides with the referred client and hired Advisor on the recommendation of such referred client. IRON will not charge clients referred via AdvisorDirect any fees or costs higher than its standard fee schedule offered to its clients or otherwise pass through to its clients Solicitation Fees paid to TD Ameritrade. For additional information regarding TD Ameritrade's AdvisorDirect program, please refer to the TD Ameritrade AdvisorDirect Disclosure and Acknowledgement Form, which is available upon request to tim.ziemba@ironfinancial.com.

IRON's participation in AdvisorDirect raises potential conflicts of interest. TD Ameritrade will most likely refer clients via AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to obtain client referrals from TD Ameritrade, IRON may have an incentive to recommend to clients that their assets be held in custody with TD Ameritrade and to place transactions for client accounts at TD Ameritrade. In addition, with respect to clients referred to IRON via AdvisorDirect, IRON has agreed not to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians except when IRON's fiduciary duties require doing so. IRON's participation in AdvisorDirect does not diminish its duty to seek best execution of trades for client accounts.

As a matter of firm practice, advisory fees paid to IRON by clients referred by Solicitors are not increased as a result of any referral.

To minimize conflicts of interest and because we feel it is the right thing to do, it is IRON's policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards, or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

Item 15 – Custody

We previously disclosed in the Fees and Compensation (Item 5) of this brochure that our firm directly debits advisory fees from client accounts.

We will not have possession of client's cash or securities. Clients will receive confirmations for each transaction, as they occur, from the custodian of the accounts. Clients will also receive a monthly statement from the custodian summarizing all activities in their accounts.

As part of the billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation.

If clients receive statements of account from IRON in addition to statements produced by the custodian(s) of the assets, we strongly recommend that clients compare the statements. One known potential source of difference is the treatment of accrued income from fixed income securities. Whereas IRON's statements will reflect accrued income as an asset due to its use of accrual accounting, custodians may omit accrued income until it is actually paid due to their use of cash accounting. Additionally, IRON will report transactions and holdings according to the date they were initiated (money transfers, trades) whereas custodians may not report transactions and holdings until they are *settled*, which can often be a day or two following the initiation/trade date. Clients are encouraged to contact IRON where unexplained discrepancies between statements or potential errors are detected.

IRON does not have actual or constructive custody of client accounts.

Item 16 – Investment Discretion

Clients hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

1. Determine the security to buy or sell.

2. Determine the amount of the security to buy or sell.

3. Determine the time to buy or sell.

Clients give us discretionary authority when they sign a discretionary agreement with our firm and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

Clients may have non-discretionary assets in their accounts.

Item 17 – Voting Client Securities

We do not vote proxies on behalf of clients. Although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for:

(1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, bankruptcy proceedings, or other corporate events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of their assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business.

Item 18 – Financial Information

We have no additional financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of $1,200 per client six months or more in advance of services rendered. Therefore, we are not required to include a financial statement.

We have not been the subject of a bankruptcy petition at any time during the past ten years.

Part 2B of Form ADV: Brochure Supplement

Aaron Bruce Izenstark
630 Dundee Road, Suite 200
Northbrook, IL 60062
847-715-3200

IRON HOLDINGS LLC; IRON FINANCIAL, LLC; THE IRON FINANCIAL COMPANIES; IRON FINANCIAL MANAGEMENT INC; IRON ASSET MANAGEMENT

Northbrook, IL 60062

March 2022

This brochure supplement provides information about Aaron Bruce Izenstark that supplements the IRON HOLDINGS LLC; IRON FINANCIAL, LLC; THE IRON FINANCIAL COMPANIES; IRON FINANCIAL MANAGEMENT INC; IRON ASSET MANAGEMENT brochure. You should have received a copy of that brochure. Please contact Timothy Ziemba at 847-715-3200 or tim.ziemba@ironfinancial.com if you did not receive IRON HOLDINGS LLC; IRON FINANCIAL, LLC; THE IRON FINANCIAL COMPANIES; IRON FINANCIAL MANAGEMENT INC; IRON ASSET MANAGEMENT's brochure or if you have any questions about the contents of this supplement.

Additional information about Aaron Bruce Izenstark is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational, Background and Business Experience

Full Legal Name: Aaron Bruce Izenstark **Born:** 1964

Education

- Indiana University; BA, Business; 1986

Business Experience

- IRON Financial: Co-Founder, President and Chief Investment Officer, 1994 to Present

Item 3 Disciplinary Information

Aaron Bruce Izenstark has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment-Related Activities

1. Aaron Bruce Izenstark is not engaged in any other investment-related activities.

2. Aaron Bruce Izenstark does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

B. Non Investment-Related Activities

Aaron Bruce Izenstark is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Item 5 Additional Compensation

Aaron Bruce Izenstark does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 Supervision

Supervisor: Not Applicable

Please contact Chief Compliance Officer Timothy Ziemba if there are any questions or concerns.

Email: tim.ziemba@ironfinancial.com

Phone: 847-715-3200

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March 2022

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Additional information about Timothy Robert Ziemba is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational, Background and Business Experience

Full Legal Name: Timothy Robert Ziemba **Born:** 1983

Education

- University of Illinois at Urbana-Champaign; BA, Economics & Statistics; 2006

Professional Designations

Timothy Robert Ziemba is a CFA® charterholder. The Chartered Financial Analyst® designation is a professional credential offered by CFA Institute to investment and financial professionals. Its obtainment requires the fulfilment of education and work experience standards as well as a passing score on each of its three examinations, each of which, according to CFA Institute, typically demand over 300 hours of study by successful candidates. Topics in which charterholders must display proficiency are as follows:

- Ethics
- Quantitative methods
- Economics
- Corporate finance
- Financial reporting and analysis
- Security analysis
- Portfolio management

Maintenance of the CFA® charter requires an annual pledge to comply with the CFA Institute Code of Ethics and Standards of Professional Conduct.

Timothy Robert Ziemba is also a CFP® (CERTIFIED FINANCIAL PLANNER™) professional. The CFP® certification is a professional certification mark for financial planners conferred in the United States by the Certified Financial Planner Board of Standards. Its obtainment requires the fulfilment of education and work experience standards as well as a passing score on its 6-hour certification examination. Its retention requires continuing education and adherence to the CFP Board's Standards of Professional Conduct, which prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. Topics in which designation holders must display proficiency are as follows:

- General principles of finance
- Insurance planning
- Employee benefits planning
- Investment and securities planning
- State and federal income tax planning
- Estate tax, gift tax, and transfer tax planning
- Asset protection planning
- Retirement planning
- Estate planning

- Financial planning and consulting

Business Experience

- IRON Financial LLC: Chief Compliance Officer, 08/2021 to Present
- IRON Financial LLC: Director of Private Client, 01/2019 to Present
- Life Line Wealth Management LLC: Wealth Manager, 07/2014 to 01/2019
- Life Line Financial Group LLC: Consultant, 07/2014 to 01/2019
- Aon Corporation: Finance Manager, 04/2014 to 07/2014
- Aon Corporation: Senior Financial Analyst, 08/2011 to 03/2014

Item 3 Disciplinary Information

Timothy Robert Ziemba has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment-Related Activities

1. Timothy Robert Ziemba is not engaged in any other investment-related activities.

2. Timothy Robert Ziemba does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

B. Non Investment-Related Activities

Timothy Robert Ziemba is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Item 5 Additional Compensation

Timothy Robert Ziemba does not receive any direct monetary benefit from a non-advisory client for the provision of advisory services. However, TD Ameritrade and Charles Schwab provide Timothy with educational opportunities via seminars and conferences. TD Ameritrade's seminars and conferences also provide Timothy with networking opportunities. Therefore, IRON Financial's relationships with TD Ameritrade and Charles Schwab provide Timothy with an economic benefit.

Item 6 Supervision

Supervisor: Aaron Izenstark

Title: President and CIO

Phone Number: 847-715-3200

Part 2B of Form ADV: Brochure Supplement

Richard Louis Lakin
630 Dundee Road, Suite 200
Northbrook, IL 60062
847-715-3200

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Northbrook, IL 60062

March 2022

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Additional information about Richard Louis Lakin is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Educational, Background and Business Experience

Full Legal Name: Richard Louis Lakin **Born:** 1961

Education

- University of Illinois; BA; 1983
- Kent College of Law; JD; 1986

Business Experience

- IRON Financial: Investment Advisor, 08/2021 to Present
- IRON Financial: Chief Compliance Officer, 06/1996 to 07/2021

Item 3 Disciplinary Information

Richard Louis Lakin has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment-Related Activities

1. Richard Louis Lakin is not engaged in any other investment-related activities.

2. Richard Louis Lakin does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

B. Non Investment-Related Activities

Richard Louis Lakin is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Item 5 Additional Compensation

Richard Louis Lakin does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 Supervision

Supervisor: Aaron Izenstark

Title: President and CIO

Phone Number: 847-715-3200