FORM ADV PART 2A

DISCLOSURE BROCHURE

August 27, 2026-

INVESTABLY

INVESTABLY LLC

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This brochure provides information about the qualifications and business practices of Investably LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 410-348-1611. 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 Investably LLC (CRD #31575) is available on the SEC's website at www.advisorinfo.sec.gov.

ITEM 2: MATERIAL CHANGES

ANNUAL UPDATE

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

MATERIAL CHANGES SINCE THE LAST UPDATE

Since the last filing of this brochure on March 23, 2026, the following has been updated:

- We have updated our address and phone number.
- Item 4 assets under management updated.
- Items 4 & 5 updated with new services, including expanded wealth advisory offerings, updated fee structure.
- Item 7 has been updated to indicate our minimum to open an account.
- Item 12 has been updated to disclose current recommended custodians.

FULL BROCHURE AVAILABLE

This Firm Brochure being delivered is the complete brochure for the Firm.

ITEM 3: TABLE OF CONTENTS

ITEM 4: ADVISORY BUSINESS

FIRM DESCRIPTION

Investably LLC ("Investably") was founded in 2021 by Michelle Gordon, AIF® who is 100% owner. Investably LLC is a registered investment advisory firm offering wealth and investment advisory service to private client households, businesses, and charitable organizations. Investably LLC is registered in the States of Florida and Maryland, and with limited registration in Texas.

Investably® is a federally registered owned by Investably LLC. Investably also claims trademark rights in its stylized design containing the literal element "Investably". Any unauthorized use is expressly prohibited.

TYPES OF ADVISORY SERVICES

Wealth Management

Investably offers personalized wealth management services, which include ongoing wealth planning and ongoing discretionary investment management to high-income individuals and families and business founders that generally have either high-income, investable assets, or net worth of $2M+. We tailor investment strategies based on individual goals, time horizons, risk tolerance, and objectives. Our services include asset allocation, investment selection, and portfolio monitoring. Clients grant Investably discretionary authority to manage transactions per the Investment Advisory Agreement. We may also support businesses and non-profits with their investment needs.

Our Wealth Management services are designed for clients desiring an ongoing and delegated relationship with a fiduciary. Our firm offers ongoing wealth management via two primary wealth management advisory relationships as noted below:

Wealth Management Advisory

The Wealth Management relationship is generally designed for high-income individuals and families seeking comprehensive wealth planning and ongoing investment management. Services generally include, as appropriate, the following ongoing wealth planning services:

1. **Financial Planning:** Comprehensive analysis of Client's income, expenses, and financial goals to create a customized roadmap for preserving, managing and growing wealth.
2. **Retirement Income Planning:** Developing a sustainable income strategy for retirement that aims to protect Clients from outliving their savings while maintaining a desired lifestyle.
3. **Tax Planning:** Strategic structuring of finances to improve household-level tax efficiency and maximize after-tax returns, in line with current laws and regulations.
4. **Foundational Estate Planning:** Analysis of changes to Client's estate and creating a plan to transfer assets efficiently and according to Client wishes, that is tax-informed and aligned with Client wishes, tha is tax-informed and aligned with Client preferences.
5. **Risk Protection Planning:** Identifying and mitigating financial risks through insurance and other strategies to protect assets and income against unexpected events.
6. **Life Transition Planning:** Guidance and coordination through major life transitions — loss of a spouse, receipt of an inheritance, job loss, major health event, or divorce— to help with the special considerations that arise from changes to income, asset titling, tax implications, estate planning updates, and adjustments to overall investment strategy. We coordinate with other professionals as needed to help preserve wealth, optimize tax outcomes, and align with long-term financial goals.
7. **Investment Analysis:** In-depth evaluation of investment opportunities, portfolio construction, and personalized strategies to align with risk tolerance, time horizon, and overall financial objectives.
8. **Discretionary Investment Trading:** Discretionary investment stewardship provides Investably with consent to buy and sell investments in client's advisory accounts without prior advance contact. Investably is a strategy and planning-first firm. Before any investment decision is made, we start with the client's full financial picture — goals, business interests, family circumstances, tax situation, and long-term objectives — and build a coordinated plan around them. Investment management is then structured and implemented to support the wealth plan. The annual service fee is based upon the complexity of each client situation, ongoing advisory work, and assets being managed. Discretionary investment stewardship typically includes:

   - **Portfolio construction and management** — building and maintaining a diversified portfolio aligned with the client's investment policy, risk profile, and time horizon
   - **Ongoing monitoring and rebalancing** — adjusting allocations as markets shift or as the portfolio drifts from target
   - **Tax-aware trading** — considering tax-loss harvesting, holding periods, and cost basis when executing trades, where appropriate

- **Cash management** — overseeing cash positions and liquidity needs within the account
- **Proactive adjustments** — updating the portfolio in response to changes in the client's goals, life circumstances, or market conditions, without requiring the client's sign-off on each individual trade
- **Coordination with the client's broader financial plan** — ensuring day-to-day investment decisions remain consistent with the client's long-term planning objectives, including any coordination with tax, estate, or business-related strategies
- Clients retain the ability to impose reasonable restrictions on the management of their account (e.g., excluding certain securities or sectors), and any such restrictions are documented and honored as part of the discretionary mandate.

9. **Altruist One Program:** Investably may subscribe select client accounts to the Altruist One Program offered by Altruist Corp. Benefits provided may include higher interest rates on cash balances, waived or discounted transaction fees, and waived or discounted fees for automated tax management tools and model portfolios. Only clients enrolled in Altruist One may have access to these benefits.
10. **Active Portfolio-Level Tax Planning**: Investably may offer and support clients with advanced portfolio tax management to help improve tax efficiency or meet specific tax-informed planning goals. Investably may employ Altruist TaxIQ to achieve greater portfolio efficiency, including tax loss harvesting, tax-sensitive rebalancing and distributions, and capital gains budgeting.
11. **High-Yield Institutional Cash:** Investably may utilize institutional high-yield cash management solutions via non-affiliated firms. Cash deposited into Program Banks earns a variable interest rate generally higher than retail banks and is generally eligible for higher combined FDIC insurance. Investably considers cash to be an asset class, and as such is included in fee calculations.
12. **Fixed Income Analysis:** Investably may offer and support clients with direct fixed income investment solutions. Investably may employ Altruist Fixed Income Trade Desk for direct access to U.S. Treasuries, Corporate Bonds, Municipal Bonds, CDs, or Government Agency fixed income. Additional Altruist transaction fees may apply.
13. **Asset-Lending Analysis:** Investably may offer clients access to Altruist's Fully Paid Lending Program for the opportunity to earn passive income on eligible securities positions. Clients may terminate participation in the program by notifying Investably or Altruist directly. Any securities being loaned out may not be protected by SIPC, may lose voting rights, and may not receive dividends.
14. **Annuities:** Investably may support clients seeking income, growth, or longevity protection via fixed and SPIA annuities, including helping clients select optimal annuity solutions, opportunities for tax-free exchanges for better capital efficiency.
15. **Held-Away Asset Management:** Investably may offer and support clients with held-away investment solutions including employee workplace retirement savings (401(k), 403(b), Cash Balance Plans), college savings (529 plans), and health savings accounts (HSA). These assets are counted towards AUM.
16. **Sub-Advisors Selection and Management:** Investably may hire Sub-Advisors to manage all or a portion of assets in the Client account. Investably has full discretion to hire and fire Sub-Advisors as they deem suitable. Separate sub-advisor fees may apply in addition to Investably's wealth management service fees.

Founder Wealth Advisory

The Founder Wealth relationship is designed to provide a virtual family office-style client experience for business owners, entrepreneurs, executives, families with $2M+ net worth, or clients with more complex financial circumstances requiring additional or advanced planning and coordination.

In addition to the services listed with the Wealth Management relationship, Founder Wealth clients may receive additional advisory services including:

1. **Business entity and ownership structure coordination** — Coordinating with the client's legal and tax professionals to evaluate and structure business entities (e.g., LLCs, S-corps, partnerships) in a manner consistent with the client's ownership wealth goals, liability protection needs, and tax planning objectives.
2. **Business retirement plan design coordination** — Working with third-party administrators, actuaries, and other professionals to help design, implement, and evaluate qualified and non-qualified retirement plans suited to the business owner's and employees' needs.
3. **Business succession and exit planning coordination** — A multi-year advisory relationship built in anticipation of an eventual ownership transition — sale, family transfer, or management buyout. Rather than a single transaction, it's

about years of deliberate preparation: valuing the business early enough to close gaps before a buyer or successor ever sees them, building management depth so the company doesn't depend on the owner, structuring estate and tax plans well ahead of any deal, and putting contingencies in place for the unexpected — all to improve the eventual value the owner realizes.

4. **Real estate planning and coordination** — Guidance on transitioning directly-held investment properties versus public and private real estate investment trusts structures. This may include planning and coordination around advanced real estate exit strategies and coordination with QIBs. Coordinating with real estate, tax, and legal professionals on the acquisition, structuring, financing, or disposition of real property held for personal or investment purposes.
5. **Debt Optimization Planning:** Planning on debt side of personal balance sheet to improve capital efficiency including but not limited to coordinating advanced lending strategies.
6. **Executive or Equity compensation planning** — Coordinating benefits and strategies for the management of stock options, restricted stock units, employee stock purchase plans, and other equity-based compensation, including tax and diversification considerations.
7. **Advanced debt planning and coordination** — Coordinating strategies for the use, structuring, or repayment of debt as part of the client's broader financial and tax planning objectives.
8. **Private Market Investments & Due Diligence** — Investably may utilize or provide clients with private market investments including private real estate, private credit, private equity, pre-IPO, and other alternative investment vehicles via non-affiliated firms, based on client's investment fit, wealth goals, and accredited investor status. In addition, as part of offering private market investments, Investably conducts due diligence, and in some cases site visits, on private market opportunities — including private equity, venture capital, private credit, pre-IPO shares, or institutional private real estate — available to accredited investors, reviewing fund terms, manager track record, and liquidity and risk factors to help clients evaluate fit within their broader portfolio. These investments carry unique risks, including illiquidity and limited regulatory oversight. The client remains responsible to consult with their tax and legal professionals regarding private market investments.
9. **Multi-entity wealth planning** — Coordinating planning strategies across multiple business entities, trusts, and investment structures to align the client's overall wealth management objectives.
10. **Cross-border planning coordination** — Coordinating with qualified professionals on planning considerations arising from clients with international assets, income, residency, or citizenship, including applicable tax and reporting matters.
11. **Advanced estate planning coordination** (estate planning beyond foundational documents) — Coordinating with estate planning attorneys on sophisticated strategies such as trusts, wealth transfer techniques, and charitable planning, beyond foundational wills and powers of attorney.
12. **Coordinating & monitoring portfolio-based lending**

    Coordinating with third-party lenders on portfolio-based lending arrangements, such as securities-based lines of credit, that allow clients to access liquidity against their investment portfolio without liquidating positions. This includes helping clients evaluate whether a lending strategy fits their broader financial plan, coordinating with the lending institution on loan structure and terms, and monitoring the pledged portfolio on an ongoing basis to help manage collateral levels and mitigate the risk of a maintenance call. Investably LLC does not act as the lender and receives no compensation from any lending institution in connection with these arrangements; clients should understand that portfolio-based lending involves leverage and carries risks, including the potential forced sale of pledged securities if collateral values decline.
13. **Additional strategic planning appropriate to the client's circumstances** — Providing coordination on other planning matters that may arise based on the client's unique financial situation, goals, or needs, as mutually agreed upon.
14. **Family-office-style professional advisor coordination** — Providing centralized oversight and coordination across the client's financial life, helping to coordinate communication, priorities, and implementation among their external advisors to ensure their wealth strategies and financial decisions remain aligned.
15. **Family-office-style reporting infrastructure** — Founder Wealth clients receive access to a family-office-style reporting and information infrastructure designed to provide a secure consolidated view of the family's total wealth across managed and held-away investments, private investments, businesses, real estate, entities, liabilities, family art collection, heirlooms, into assets for one connected view for ongoing reporting, oversight, risk analysis, and informed decision-making. (*Additional fees apply).*

Emerging Wealth Portfolio Program

Investably offers professionally-designed investment portfolios and planning for next-gen/early-stage clients who have under $600,000 to invest and beginning to accumulate towards their financial independence. This service includes an annual financial and tax planning review, along with monthly education, budgeting, debt and savings tools. This service is available by invitation only.

Sub-Advisory Services

Investably may act as a sub-adviser to other non-affiliated investment advisors (Primary Advisor) who hire Investably to manage a portion or all of a client's portfolio. The Primary Advisor must have discretionary authority over the account and the ability to delegate that discretionary trading authority to Investably. This may include Donor Advised Funds (DAF) via unaffiliated third-party providers.

ERISA Plan Services

Investably may provide service to qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans. Investably may act as a 3(21) advisor:

Limited Scope ERISA 3(21) Fiduciary. Investably may serve as a limited scope ERISA 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions. The plan sponsor is still ultimately responsible for the decisions made in their plan.

Fiduciary Services include:

- Providing investment advice regarding asset classes and investment alternatives available for the Plan in accordance with the Plan's investment policies and objectives.
- Supporting the Client in the development of an Investment Policy Statement ("IPS").
- Providing investment advice to the Plan Sponsor with respect to selecting an ERISA provider that meets the client's needs.
- Providing guidance on investment options by reviewing periodic investment reports provided by the plan provider.
- Meeting with Client on a periodic basis to discuss the reports and investment recommendations.

Non-Fiduciary Services include:

- Assisting in the education of Plan participants about general investment information.
- Assisting in group enrollment meetings designed to increase retirement plan participation and investment understanding.

Investably has no responsibility to provide services related to Excluded Assets, including: employer securities; real estate (except for real estate funds or publicly traded REITs); stock brokerage accounts or mutual fund windows; participant loans; non-publicly traded partnership interests; other non-publicly traded securities or property; or other hard-to-value or illiquid securities or property.

One-Time Project-Based Planning/Consulting Services

This service is appropriate for non-wealth management clients that may be interested in a one-time engagement. One-time projects may include: Retirement Income Design & Strategy, Comprehensive Financial Plan, Independent Portfolio & Tax Profile Analysis, or Wealth Architecture.

Pre & Post Liquidity Planning & Coordination Services

Certain clients may engage Investably to provide strategic advisory and coordination services centered on a specific, imminent or a significant liquidity event (a "Liquidity Event"), such as the sale of a privately held business, recapitalization, merger, acquisition, initial public offering (IPO), redemption of private equity interests, or other significant monetization event.

These generally require separate additional services and are separate from the Firm's ongoing wealth management relationships and discretionary investment management and are intended to assist clients in preparing for the financial, tax, investment, estate, and wealth transfer implications of a Liquidity Event.

Services may include, as appropriate:

- Pre-sale wealth planning;
- Coordination with attorneys, accountants, investment bankers, and other professional advisors;
- Tax-efficient liquidity planning;
- Charitable and philanthropic planning;
- Trust and estate planning coordination;
- Investment allocation planning for anticipated proceeds;
- Cash flow and liquidity forecasting;
- Risk management planning;
- Family governance discussions; and

- Other strategic planning related to the Liquidity Event.

Seminars and Workshops

Investably LLC may host wealth summits, seminars, workshops, or cohort-based programs for the purpose of providing general education to the public regarding various wealth strategies, investments, and the services offered by the firm. Attendance at these seminars, workshops, and programs may require payment of a flat fee, which will be disclosed to attendees in advance. These programs are educational in nature and do not constitute individualized investment advice. These events may cover topics such as wealth planning concepts, general investing principles, and tax-related considerations, and may also include opportunities for one-on-one individual consultations with firm representatives. Investably LLC does not provide tax or legal advice; attendees should consult their own tax or legal professional. Attendance at, or participation in, any event does not create an advisory relationship between the attendee and Investably LLC; such a relationship is established only upon execution of a written advisory agreement.

CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS

Investably LLC views each client relationship as ongoing and long-term. A client's goals and objectives are documented at the outset of the relationship and are revisited and updated over time as the client's circumstances, priorities, and life stage evolve. Investment and wealth strategies are developed to reflect these stated goals and objectives and are adjusted accordingly as they change. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written client consent.

WRAP FEE PROGRAMS

Investably does not sponsor any wrap fee programs.

CLIENT ASSETS UNDER MANAGEMENT

Type	Amount	Date Calculated
Discretionary	$2,673,876	August 8, 2026
Non-Discretionary	$0	August 8, 2026

ITEM 5: FEES AND COMPENSATION

METHOD OF COMPENSATION AND FEE SCHEDULE

Wealth Management Services

Investably's compensation consists of an annual fee based on a percentage of assets under management, subject to a minimum annual fee as follows:

- **Wealth Management Advisory:** Annual fee of up to 1.00% of the assets we manage or $12,000 annual minimum fee ($1,000 per month). You pay whichever is greater: % of managed assets, or the $12,000 annual minimum.

  Integrated planning for your personal financial life — investments, retirement, tax, estate, and protection in one coordinated strategy, for high earners building wealth before it grows complex.

- **Founder Wealth Advisory:** Annual fee of up to 1.00% of the assets we manage or $36,000 annual minimum fee ($3,000 per month). You pay whichever is greater: % of managed assets, or the $36,000 annual minimum.

  A Virtual Family Office–style experience — everything in wealth management advisory, plus advanced coordinated planning and oversight across your businesses, real estate, equity compensation, and advanced estate trusts planning.

The annual fee is billed monthly in arrears and deducted from custodied assets or in some cases via third-party provider.

One-time Onboarding and Implementation Fees

Investably may charge a one-time Client Onboarding and Implementation Fee for new advisory relationships.

- Flat fee starting at $2,500 for wealth management clients
- Flat fee starting at $5,000 for founder wealth clients

The onboarding fee includes the initial work required to implement the client's advisory relationship and may include:

- Collection and organization of financial information;

- Account aggregation and technology platform setup;
- Integration of custodial, investment, banking, and other financial data feeds;
- Configuration of client reporting and digital portal access;
- Initial financial, portfolio, tax, and discovery data review;
- Development of the client's wealth management profile;
- Coordination with existing professional advisors;
- Preparation for initial planning meetings; and
- Implementation of the advisory relationship.

The Client Onboarding and Implementation Fee are separate from the Firm's ongoing advisory fees and is intended to compensate the Firm for the upfront administrative, technology, planning, and implementation resources required to establish and customize the client relationship.

The fee amount, if applicable, will be disclosed to prospective clients prior to engagement and will be specified in the client's Investment Advisory Agreement.

Emerging Wealth Portfolio Program

The fee for this service is a maximum annual fee of 1.00% or a flat annual fee of $3,000, whichever is greater. The minimum account size is $150,000.

Fee Negotiability

The Firm reserves the right to negotiate fees based on factors including, but not limited to:

- Complexity of the engagement;
- Scope of requested services;
- Household structure;
- Anticipated service requirements;
- Existing client relationships;
- Family relationships;
- Employer-sponsored relationships; or
- Other business considerations.

Accordingly, similarly situated clients may pay different fees.

Billing

Relationship fees are generally billed monthly in arrears and deducted directly from client accounts maintained with the qualified custodian, unless otherwise provided in the client's Investment Advisory Agreement.
Fees are generally calculated monthly in arrears, based on daily average value, and deducted directly from client accounts maintained with the qualified custodian upon written authorization.
Clients will receive statements directly from their qualified custodian and should compare advisory fee deductions shown on custodial statements with any invoices or fee calculations provided by the Firm.

Retirement Account Rollovers — Potential Conflict of Interest

If you own any type of IRA account, or if you have a qualified plan with your employer and you terminate your employment, you may have up to four options with respect to your retirement accounts: (1) leave the money where it is, (2) roll the money over to a new employer's plan, (3) roll the money into an Individual Retirement Account ("IRA"), or (4) withdraw the money and pay taxes on it (and penalties, if applicable).

If your fee is based on assets under management and we recommend that you roll your retirement money into an account managed by us, we will be subject to a conflict of interest because the account will generate additional fee income for us. We operate under a fiduciary standard when giving you advice of any kind. You are not under any obligation to rollover Investably LLC retirement plan assets to an account managed by us.

ERISA Plan Services Fees

Retirement plan advisory services are generally provided for an annual advisory fee of 1.00% (100 basis points) of the assets under management for the retirement plan.

The Firm maintains a minimum annual advisory fee of $6,000 for retirement plan engagements. The minimum fee is intended to compensate the Firm for the ongoing fiduciary oversight, investment monitoring, governance support, and advisory services provided regardless of plan asset size.

Fees are generally calculated and billed monthly in arrears unless otherwise specified in the Retirement Plan Advisory Agreement, billed to the client business entity. Each client is responsible for confirming with their CPA or tax professional about tax deductibility of this fee.

Unless otherwise agreed in writing, retirement plan advisory fees are invoiced directly to and payable by the plan sponsor (business entity). The plan sponsor may elect to pay the advisory fee directly or authorize payment from plan assets to the extent permitted under ERISA and applicable law. The method of payment will be specified in the Retirement Plan Advisory Agreement and consistent with applicable fiduciary requirements.

The Firm reserves the right to negotiate fees based on factors including the size of the plan, number of participants, complexity of services requested, fiduciary responsibilities assumed, and anticipated service requirements. Accordingly, similarly situated retirement plans may pay different fees.

Retirement plan advisory fees are separate from fees charged by third-party administrators, recordkeepers, custodians, auditors, attorneys, accountants, or other service providers engaged by the retirement plan or plan sponsor. Those fees are paid independently and are in addition to Investably's advisory fee.

Fees are billed to the plan sponsor entity. It is up to the client to confirm with their tax professional regarding any applicable tax treatment.

Sub-Advisor Selection and Management Services

Investably may obtain a sub-advisory relationship for special advanced services including but not limited to private investments. A flat fee of up to 1.00% may be charged on total assets under management.

Advisor reserves the right to invoice a larger amount per the client's complexity level at onboarding. The Implementation Fee is earned upon receipt and is non-refundable.

Pre & Post Liquidation Planning & Coordination Advisory Services

Certain engagements involving significant liquidity events or complex multi-advisor coordination are structured as separate fixed-fee engagements under the Liquidity Event Coordination™ framework. These fees are governed by a separate engagement letter and are not included in the planning retainer or investment management fee. Fees for one-time event-based strategy and coordination planning will be charged between $10,000 and $50,000 based on complexity. Prior to the planning process the Client will be provided an estimated plan fee and agreement. This fee is generally payable one time upon the successful completion of the Liquidity Event or upon signing if the liquidity event has already happened. This is separate from any annual relationship fees or Investment Stewardship Fees. Examples include sale of a business, real estate dispositions, professional contract proceeds, or legal settlement proceeds.

One-Time Project-Based Planning/Consulting Services

On a limited basis, at the firm's discretion, one-time engagements are available at a flat fee starting at $1,000 for non-management clients and up to $50,000 based on complexity. Investably reserves the right to waive or reduce the fees. Separately, Investably may elect to charge a non-negotiable hourly fee of up to $400 with a minimum 3-hour requirement. Prior to the engagement the Client will be provided an estimated plan fee and agreement.

Seminars and Workshops

Investably may offer educational programs for a fee of up to $20,000 per attendee. Fees are paid via a third-party platform at the time of registration.

Family Office Style Reporting Infrastructure

Founder Wealth relationships include a dedicated family-office-style reporting infrastructure designed to provide a consolidated view of the family's wealth across managed and held-away investments, private investments, businesses, real estate, entities, liabilities, art collection, family heirlooms, and other assets. The annual infrastructure fee supports the personalized setup, integration, organization, ongoing maintenance, reconciliation and secure reporting required to keep this financial picture current and decisionready. An annual recurring fee of $7,500/year applies. This is paid during client signing and recurs annually, paid monthly from custodied account as $625/month.

Household Pricing

Investably may establish advisory relationships at the **household** level rather than on an individual account basis. A household may include spouses, domestic partners, dependent children, trusts, family partnerships, family limited liability companies, donor-advised funds, or other related entities under common ownership or control for which the Firm provides advisory services.

The Firm may aggregate accounts and relationships within a household for purposes of determining advisory services, billing arrangements, reporting, and fee administration, where appropriate and agreed upon by the client.

Clients participating in the Founder Wealth relationship may have multiple household members, trusts, business entities, and related investment accounts included within a single advisory engagement when determined appropriate by the Firm. The annual Relationship Fee reflects the overall complexity of the advisory relationship and is not based solely on the number of accounts managed.

Each adult family member receiving wealth and investment advisory services will execute the applicable advisory agreements and other account documentation required by the Firm and the client's custodian, unless otherwise permitted by applicable law.

Investably generally establishes a virtual family office-style experience for Founder Wealth relationships at the household or family group level. Depending on the scope of the engagement, the Firm may provide advisory services to multiple related individuals and entities under a single advisory relationship.

A virtual family office-style experience relationship may include one or more of the following:

- Primary client(s);
- Spouse or domestic partner;
- Adult children;
- Dependent children;
- Parents or grandparents;
- Trusts;
- Family limited partnerships;
- Family limited liability companies;
- Family investment companies;
- Real estate holding entities;
- Private foundations;
- Donor-advised funds;
- Closely held businesses; and
- Other related entities or family members approved by the Firm.

The individuals and entities included will be identified in the applicable Investment Advisory Agreement.

The Firm may provide varying levels of advisory services to different members of the family group. Certain services may be limited to education, planning coordination, or financial guidance, while discretionary investment management may be provided only for those individuals or entities that have entered into the appropriate advisory agreements and granted the Firm the necessary authority.

The annual Relationship Fee reflects the overall complexity, coordination, and scope of services provided to the family group and is not determined solely by the number of individuals, accounts, or entities included in the engagement.

CLIENT PAYMENT OF FEES

Fees for wealth management services, assets held away services, commission-free annuities, private investments and sub-advisor fees are deducted from a designated Client account to facilitate billing, or they may pay Investably directly via a third-party platform. The Client must consent in advance to direct debiting of their investment account.

Investably, pursuant to Regulations .15 and .17 of the Code of Maryland Regulations, requires: (1) written authorization from the client to deduct advisory fees; (2) concurrent notice to the custodian of the amount of fee to be deducted; (3) invoice to the client itemizing the fee; and (4) custodian statements showing all disbursements at least monthly.

ADVISORY SERVICE CHANGES

Clients fall into one of three segments: Founder Wealth, Wealth Management, and Emerging Wealth. Segment changes are initially triggered by household AUM crossing a threshold or as informed by the client of changing financial complexity needs, but nothing changes for the client until the advisor has a conversation with them first — only after that discussion do the updated pricing and new service standards take effect.

ADDITIONAL CLIENT FEES CHARGED

Investably's advisory fees do not include fees or expenses charged by third parties. Clients may incur additional costs, including, but not limited to:

- Custodial fees;
- Brokerage commissions or transaction charges;
- Mutual fund and ETF operating expenses;
- Alternative investment management fees and expenses;
- Sub-advisory fees;
- Wire transfer fees;
- Margin interest;
- Exchange fees; and
- Other account-related expenses.

These charges are separate from and in addition to the Firm's advisory fees.

Investably does not receive any compensation from these fees.

PREPAYMENT OF CLIENT FEES

Investably does not require any prepayment of fees of more than $500 per Client and six months or more in advance.

EXTERNAL COMPENSATION FOR THE SALE OF SECURITIES TO CLIENTS

Investably does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of Investably.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

SHARING OF CAPITAL GAINS

Fees are not based on a share of the capital gains or capital appreciation of managed securities. Investably does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for Investably to recommend an investment that may carry a higher degree of risk to the Client.

ITEM 7: TYPES OF CLIENTS

DESCRIPTION

Investably is a wealth management firm that provides a total wealth strategy and planning-first approach with integrated investment management for high-net-worth private clients, high-income households, business founders, clients with greater financial complexity in need of more advanced tax and estate planning. Investably also supports businesses and non-profits with investment management and retirement plans. Investably may also offer an invitation of high-earners in their early accumulation phrase to our emerging wealth service.

ACCOUNT MINIMUMS

Investably has designed our wealth management services around the distinct needs of clients with significant assets and income. Our Founder Wealth service requires $2,000,000, Wealth Management generally requires a household investment of $600,000, and our Emerging Wealth Portfolio Program requires $150,000. Investably LLC reserves the right, in its sole discretion, to waive or reduce these minimums on a case-by-case basis.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

METHODS OF ANALYSIS

Security analysis methods may include Modern Portfolio Theory — the theory of finance that attempts to maximize portfolio expected return for a given amount of portfolio risk by carefully choosing the proportions of various assets. In developing a financial plan for a Client, Investably's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. The main sources of information include investment and financial planning technologies, financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

INVESTMENT STRATEGY

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations and their planning assessments. The Client may change these objectives at any time by providing written notice to Investably. Each Client executes an assessment via planning software that documents their assets, incomes, investment objectives, risk profiles, and financial goals. Other strategies may include long-term purchases, short-term purchases, and trading.

We may offer specialized private banking and HNW lending resources designed to improve liquidity, tax efficiency, and capital flexibility. We do not receive compensation from these providers, allowing us to recommend solutions based solely on client suitability and objectives.

We may offer synthetic box spreads loans. This is an advanced lending strategy that utilizes box spreads on S&P 500 Index (SPX) to construct loans tailored for your clients. Each box spread is a basket of 4 option contracts that function like a zero-coupon bond. The box spread structure allows our clients to get liquidity from the options market.

Clients using box spread lending strategy may need to grant a designated third-party provider with limited power of attorney (LPOA) to grant them ability to conduct trading and fee payment authorization on the account.

SECURITY SPECIFIC MATERIAL RISKS

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- Market Risk: The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations.
- Interest-Rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. When interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Inflation Risk: When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- Reinvestment Risk: The risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return. This primarily relates to fixed income securities.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. Treasury Bills are highly liquid, while real estate properties are not.
- Covered Call Risk: Funds that employ a covered call buy-write strategy can limit potential upside gains, as the call options sold cap the investor's profit if the underlying asset rises significantly.
- Management Risk: The advisor's investment approach may fail to produce the intended results.
- Equity Risk: Equity securities tend to be more volatile than other investment choices. Small- and mid-cap companies are subject to additional risks including greater volatility, higher failure rates, more limited markets, and less management experience.
- Fixed Income Risk: The issuer of a fixed income security may not be able to make interest and principal payments when due. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease.
- Investment Companies Risk: When a client invests in open-end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds.
- Foreign Securities Risk: Foreign securities are subject to additional risks including currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability), different trading practices, less government supervision, and greater volatility.
- Long-Term Purchase Risk: Long-term investments are those purchased with the intention of being held for more than one year. One of the biggest risks associated with long-term investments is volatility and fluctuations in the financial markets.

- Short-Term Purchase Risk: Short-term investments are typically held for one year or less and may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.
- Trading Risk: Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- Structured Notes Risk: The risks involved with using structured notes are credit risk of the issuing investment bank, illiquidity, and risk to the pricing accuracy as most structured notes do not trade after issuance.
- Alternative Investment Risk: Alternative investments may not be suitable for all investors as they may carry significantly higher risk, can be highly illiquid, and may be more complex and speculative in nature.
- Foreign Investment Risk: Investments in foreign securities may be riskier than U.S. investments because of factors such as unstable international, political and economic conditions, currency fluctuations, and foreign controls on investment and currency exchange.
- Annuities Risk: Annuities are insurance contracts meant to help clients transfer risk. While commission-free, they may subject clients to surrender charges if funds are pulled before the designated time. Assets may experience Market Value Adjustment (MVA) which may increase or decrease the withdrawal amount.
- Variable Annuity Risk: Variable annuities pay amounts that vary according to the performance of a specified set of investments. They may impose various fees and expenses including mortality and expense risk charges, administrative fees, and underlying fund expenses.
- Sub-Advisor Risk: Risks associated with utilizing Sub-Advisors include the Sub-Advisor failing to execute on the stated investment strategy, having financial or regulatory problems, and other specific associated risks disclosed in their respective Form ADV Part 2.

Illiquid Investments — Special Risk Disclosure

Examples of illiquid investments include private funds of all types (private equity, real estate, hedge funds, etc.). Public investments that do not trade very often (including many municipal bonds) are also illiquid. It is particularly disadvantageous if an investment you already own that was liquid suddenly becomes illiquid.

If you purchase an illiquid investment (or an investment you already own suddenly becomes illiquid) you may be forced to hold that investment until it matures. Even at maturity, you may not be able to recover all of your capital, and you may incur a large opportunity cost. If you attempt to sell an illiquid investment prior to maturity, a sale may only be possible at a steep discount from the investment's nominal value. During the time you hold an illiquid investment, it may be difficult or impossible for anyone to provide you with accurate information about the investment's rate of return or its market value.

Investments in certain underlying funds, including private equity and real assets, will be illiquid, entailing a high degree of risk. An investor in an illiquid underlying fund may be expected to hold its investment for the entire life of the underlying fund, which is typically seven to ten years or more (and for private equity anchor investments possibly fifteen years or more).

- Delaware Statutory Trust (DST): Investments in Delaware Statutory Trusts ("DSTs") involve a high degree of risk and are intended only for investors who meet applicable suitability and accreditation standards. DST interests are typically offered through private placement and are not publicly traded, resulting in limited liquidity. Investors should be prepared to hold their investment for an extended period, often 5–10 years or longer, with no guarantee of early exit.
- DST investments are subject to real estate market risks, including but not limited to changes in property values, tenant occupancy, interest rates, financing conditions, and broader economic factors. Income distributions, if any, are not guaranteed and may fluctuate or cease entirely.
- While DSTs are commonly utilized as part of a 1031 exchange, the tax treatment depends on individual circumstances and current tax law, both of which are subject to change. Clients should consult with their tax advisor prior to making any investment decision.
- DST investors hold a beneficial interest in the trust and do not have active management control over the underlying properties. All operational decisions are made by the sponsor, whose performance and experience may materially impact investment outcomes.
- Fees and expenses associated with DST investments may be substantial and can reduce overall returns. These may include acquisition fees, asset management fees, financing costs, and disposition fees.
- Past performance of any DST sponsor or underlying real estate investment is not indicative of future results. There can be no assurance that investment objectives will be achieved or that investors will receive a return of capital.

- Investably LLC does not guarantee the performance of any DST investment and recommends that all investment decisions be made within the context of a client's broader Wealth Architecture™, including considerations for liquidity, income needs, tax strategy, and long-term objectives.
- Risks associated with utilizing Sub-Advisors include the Sub-Advisor failing to execute on the stated investment strategy, having financial or regulatory problems, and other specific associated risks disclosed in their respective Form ADV Part 2.
- **Renewable Energy and Tax-Advantaged Private Investments:**

  Investably may recommend or assist clients in evaluating renewable energy and other private investments that may provide federal or state tax benefits, including tax credits, depreciation deductions, or other incentives. These investments involve risks, including illiquidity, loss of principal, project and sponsor risk, regulatory changes, and the potential reduction, disallowance, or recapture of anticipated tax benefits. The availability and value of any tax benefit depends on applicable law and each client's individual tax circumstances, and Investably does not guarantee any investment or tax outcome. Clients should consult their independent tax and legal professionals regarding the tax consequences of any investment. Investably evaluates these opportunities in the context of the client's overall investment objectives, risk tolerance, liquidity needs, portfolio concentration, and financial circumstances. Renewable energy projects and tax-credit investments may be offered through private funds, limited liability companies, partnerships, special-purpose entities, or other privately offered investment vehicles. These investments generally are not publicly traded and may have limited or no secondary market. Clients should therefore be prepared to hold these investments for an extended period and should not invest capital that is expected to be required for near-term liquidity needs. Investably does not receive commissions, placement fees, referral fees, tax-credit proceeds, developer compensation, sponsor compensation, or other transaction-based compensation from renewable energy project sponsors or investment issuers in connection with investments recommended to advisory clients. Investably's compensation for evaluating and advising upon such investments is derived from the advisory fees described elsewhere in this Brochure.

Opportunity Zones — Special Risk Disclosure

Investments in underlying funds that intend to qualify as Qualified Opportunity Funds ("QOFs") under Section 1400Z-2 of the Internal Revenue Code involve significant structural and tax risks. While underlying managers work to structure and operate certain funds as QOFs, such structuring and operations may be insufficient, such that the funds may not actually qualify as QOFs, and investors in such funds may not be eligible for benefits under the Opportunity Zone Provisions. The Opportunity Zone Provisions are subject to change. Clients who invest in underlying funds which are intended to qualify as QOFs are urged to consult with their tax advisors.

ITEM 9: DISCIPLINARY INFORMATION

CRIMINAL OR CIVIL ACTIONS

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

ADMINISTRATIVE ENFORCEMENT PROCEEDINGS

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

SELF-REGULATORY ORGANIZATION ENFORCEMENT PROCEEDINGS

Investably 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 Investably or the integrity of its management.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

BROKER-DEALER OR REPRESENTATIVE REGISTRATION

Investably is not registered as a broker-dealer.

FUTURES OR COMMODITY REGISTRATION

Neither Investably nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

MATERIAL RELATIONSHIPS MAINTAINED BY THIS ADVISORY BUSINESS AND CONFLICTS OF INTEREST

Michelle Gordon is separately licensed as an insurance agent and is the sole owner of Prosperably LLC, an affiliated insurance agency. She spends approximately 10% of her time on these insurance-related activities and may offer clients insurance products and services through this affiliation, for which she or her firm will receive separate, typical insurance-based compensation.

Michelle Gordon is also the sole owner of Tax Optimally LLC, an affiliated tax planning and consulting firm. She spends approximately 10% of her time on this business and may offer clients tax planning services through this affiliation, for which the firm may receive separate, typical consulting compensation.

> **Media and Public Engagement**
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> Michelle Gordon is a media expert guest featured weekly in ComercioTV. She may be compensated for brand partnerships, writing, or public speaking engagements. These outside business activities do not make up more than 10% of her time. This practice may represent a conflict of interest as it gives an incentive to recommend products or services based on compensation received rather than on a client's needs. This conflict is mitigated by disclosures, procedures and Ms. Gordon's obligation to place the best interest of the Client first.

Investably may engage in a revenue-sharing arrangement with a third-party financial technology provider to offer a suite of cash and lending management solutions, including high-yield savings accounts, securities-backed lines of credit, and related financial services. As part of this arrangement, Investably may elect to receive compensation which presents a conflict of interest. Such compensation is paid by the third-party provider and is separate and apart from the advisory fees clients pay to Investably.

Additionally, Michelle Gordon is the sole owner of Happy Wealthy Me LLC, which provides financial wellness and education, and is the sole owner of Lendbly LLC, a marketing firm. She spends less than 2% of her time on each of these businesses.

Clients are under no obligation to use any products or services offered through these affiliated businesses, and are free to select any other provider of these services. These affiliations create a conflict of interest, as the compensation Michelle Gordon and her affiliated businesses receive from clients who choose to use these services creates an incentive to recommend them. Investably LLC addresses this conflict by disclosing it here and by requiring that all recommendations remain consistent with the firm's fiduciary duty to act in each client's best interest.

RECOMMENDATIONS OR SELECTIONS OF OTHER INVESTMENT ADVISORS AND CONFLICTS OF INTEREST

Investably may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and Investably. Sub-Advisors execute all trades on behalf of Investably in Client accounts. Investably will be responsible for the overall direct relationship with the Client. Investably retains the authority to terminate the Sub-Advisor relationship at Investably's discretion.

This practice represents a conflict of interest as Investably may select Sub-Advisors who charge a lower fee for their services than other Sub-Advisors. This conflict is mitigated by disclosures, procedures, and by the fact that Investably has a fiduciary duty to place the best interest of the Client first.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

CODE OF ETHICS DESCRIPTION

The affiliated persons of Investably have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Investably affiliated persons and addresses conflicts that may arise. The Code reflects Investably and its supervised persons' responsibility to act in the best interest of their Client.

Investably's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Investably's Code is based on the guiding principle that the interests of the Client are our top priority. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company. Investably will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

INVESTMENT RECOMMENDATIONS INVOLVING A MATERIAL FINANCIAL INTEREST AND CONFLICT OF INTEREST

Investably and its affiliated persons do not recommend to Clients securities in which they have a material financial interest.

ADVISORY FIRM PURCHASE OF SAME SECURITIES RECOMMENDED TO CLIENTS AND CONFLICTS OF INTEREST

Investably and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest, affiliated persons are required to disclose all reportable securities transactions as well as provide Investably with copies of their brokerage statements. The Chief Compliance Officer, Michelle Gordon, reviews all trades of the affiliated persons each quarter.

CLIENT SECURITIES RECOMMENDATIONS OR TRADES AND CONCURRENT ADVISORY FIRM SECURITIES TRANSACTIONS AND CONFLICTS OF INTEREST

Investably does maintain a firm proprietary trading account and affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest, the firm and affiliated persons are required to disclose all reportable securities transactions. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients receive preferential treatment over associated persons' transactions.

ITEM 12: BROKERAGE PRACTICES

FACTORS USED TO SELECT BROKER-DEALERS FOR CLIENT TRANSACTIONS

Investably will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. Factors affecting brokerage selection include: the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, and the financial strength and stability of the broker.

Investably will recommend the use of Altruist Financial LLC, Interactive Brokers, and Betterment Advisor Solutions.

Research and Other Soft Dollar Benefits

Investably may receive products, research and/or other services from custodians or broker-dealers connected to client transactions or "soft dollar benefits". As permitted by Section 28(e) of the Securities Exchange Act of 1934, Investably receives economic benefits as a result of commissions or fees generated from securities transactions. A conflict of interest exists when Investably receives soft dollars which could result in higher fees charged to Clients. This conflict is mitigated by the fact that Investably has a fiduciary responsibility to act in the best interest of its Clients.

Brokerage for Client Referrals

Investably does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

Directed Brokerage

Clients who direct brokerage outside Investably's recommendation may be unable to achieve the most favorable execution of client transactions. In a directed brokerage account, clients may pay higher brokerage commissions because Investably may not be able to aggregate orders to reduce transaction costs.

AGGREGATING SECURITIES TRANSACTIONS FOR CLIENT ACCOUNTS

Investably is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis.

ITEM 13: REVIEW OF ACCOUNTS

SCHEDULE FOR PERIODIC REVIEW OF CLIENT ACCOUNTS

Account reviews are performed quarterly by the Chief Compliance Officer. Account reviews are performed more frequently when market conditions dictate. Reviews include: a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria; reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing; and reviewing accounts for tax loss harvesting opportunities.

One-time Financial plans generated are updated as requested by the Client. Investably suggests updating at least annually.

REVIEW OF CLIENT ACCOUNTS ON NON-PERIODIC BASIS

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

CONTENT OF CLIENT PROVIDED REPORTS AND FREQUENCY

Clients receive written account statements at least quarterly for managed accounts, issued by the client's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. Performance reports will be provided by Investably at least quarterly to Clients with assets under management.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

ECONOMIC BENEFITS PROVIDED TO THE ADVISORY FIRM FROM EXTERNAL SOURCES AND CONFLICTS OF INTEREST

Investably receives additional economic benefits from external sources as described above in Item 12.

ADVISORY FIRM PAYMENTS FOR CLIENT REFERRALS

Investably does not compensate for Client referrals.

ITEM 15: CUSTODY

ACCOUNT STATEMENTS

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients should carefully review statements received from the custodian and are urged to compare account statements they receive from the qualified custodian with those they receive from the adviser.

Investably is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of Investably. If Investably is authorized to deduct fees directly: Investably will provide the Client with an invoice concurrent to instructing the custodian to deduct the fee; Investably will obtain written authorization signed by the Client; and the Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

ITEM 16: INVESTMENT DISCRETION

DISCRETIONARY AUTHORITY FOR TRADING

Investably requires discretionary authority to manage securities accounts on behalf of Clients. Investably has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Investably allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions must be provided to Investably in writing.

ITEM 17: VOTING CLIENT SECURITIES

PROXY VOTES

Investably does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent. When assistance on voting proxies is requested, Investably will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

ITEM 18: FINANCIAL INFORMATION

BALANCE SHEET

A balance sheet is not required to be provided to Clients because Investably does not serve as a custodian for Client funds or securities and Investably does not require prepayment of fees of more than $500 per Client and six months or more in advance.

FINANCIAL CONDITIONS REASONABLY LIKELY TO IMPAIR ADVISORY FIRM'S ABILITY TO MEET COMMITMENTS TO CLIENTS

Investably has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

BANKRUPTCY PETITIONS DURING THE PAST TEN YEARS

Investably has not had any bankruptcy petitions in the last ten years.

ITEM 19: REQUIREMENTS FOR STATE REGISTERED ADVISORS

PRINCIPAL EXECUTIVE OFFICERS AND MANAGEMENT PERSONS

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

OUTSIDE BUSINESS ACTIVITIES

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

PERFORMANCE BASED FEE DESCRIPTION

Neither Investably nor its management receive performance-based fees. Please see Item 6 of the ADV 2A for more information.

DISCLOSURE OF MATERIAL FACTS RELATED TO ARBITRATION OR DISCIPLINARY ACTIONS INVOLVING MANAGEMENT PERSONS

Neither Investably nor its management have been involved in any arbitration claims, awards, or civil/administrative proceedings involving an investment or investment-related business, fraud, false statements or omissions, theft, embezzlement, bribery, forgery, counterfeiting, extortion, or dishonest, unfair or unethical practices.

MATERIAL RELATIONSHIP MAINTAINED BY THIS ADVISORY BUSINESS OR MANAGEMENT PERSONS WITH ISSUERS OF SECURITIES

There are no material relationships with issuers of securities to disclose.

BROCHURE SUPPLEMENT

FORM ADV PART 2B

Supervised Person Brochure

Michelle Gordon, AIF®, CETF®

August 27, 2026

INVESTABLY LLC

300 S Orange Ave #1000, Orlando, FL 32801

www.Investably.com · hello@investably.com · 689-220-1358

This brochure supplement provides information about Michelle Gordon and supplements the Investably LLC brochures. You should have received a copy of that brochure. Please contact Michelle Gordon if you did not receive the brochure or if you have any questions about the content of this supplement. Additional information about Michelle Gordon (CRD #5608002) is available on the SEC's website at www.adviserinfo.sec.gov.

PRINCIPAL EXECUTIVE OFFICER — MICHELLE GORDON, AIF®, CETF®

Year of birth: 1980

ITEM 2 — EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Educational Background:

- New York University (NYU); Dual Bachelor of Arts – Sociology & Latin American Studies; 2003

Business Experience:

- Investably LLC; Managing Member/CEO; 04/2021 – Present
- Investably LLC; Investment Advisor Representative/Chief Compliance Officer; 07/2021 – Present
- Tax Optimally, LLC; Managing Member/CEO; 03/2026 - Present
- Prosperably LLC; Managing Member/Insurance Agent; 08/2024 – Present
- Michelle Gordon, Sole Proprietor; Insurance Agent; 01/2022 – Present
- Happy Wealthy Me LLC; Managing Member; 01/2025 – Present
- Lendbly LLC; Managing Member; 01/2025 – Present
- The Leaders Group, Inc.; Registered Representative; 01/2024 – 01/2025
- The Leaders Group, Inc.; Registered Representative/Insurance Agent; 07/2021 – 01/2022
- ProFund Advisors; Manager of Client Services; 08/2015 – 04/2021
- ProFund Advisors; Client Services; 07/2010 – 08/2015

Professional Certifications:

Accredited Investment Fiduciary® (AIF®): Awarded from the Center for Fiduciary Studies, LLC. Requirements: Complete training curriculum; Pass the 60-question AIF® exam with 75% correct answers; Sign and agree to abide by a Code of Ethics; Complete six hours of continuing professional education; Maintain current contact information in fi360's designee database; Submit yearly renewal application with annual dues.

ITEM 3 — DISCIPLINARY INFORMATION

Ms. Gordon has never been involved in a criminal or civil action, administrative proceeding, or self-regulatory organization proceeding of any kind involving investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, extortion, or dishonest, unfair or unethical practices. Ms. Gordon has not been the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, her from engaging in any investment-related activity.

ITEM 4 — OTHER BUSINESS ACTIVITIES

Michelle Gordon is separately licensed as an insurance agent and is the sole owner of Prosperably LLC, an affiliated insurance agency. She spends approximately 10% of her time on these insurance-related activities and may offer clients insurance products and services through this affiliation, for which she or her firm will receive separate, typical insurance-based compensation.

Michelle Gordon is also the sole owner of Tax Optimally LLC, an affiliated tax planning and consulting firm. She spends approximately 10% of her time on this business and may offer clients tax planning services through this affiliation, for which the firm may receive separate, typical consulting compensation.

> **Media and Public Speaking**
>
> Michelle Gordon is a media expert guest featured weekly in ComercioTV. She may be compensated for brand partnerships, writing, or public speaking engagements. These outside business activities do not make up more than 10% of her time. This practice may represent a conflict of interest as it gives an incentive to recommend products or services based on compensation received rather than on a client's needs. This conflict is mitigated by disclosures, procedures and Ms. Gordon's obligation to place the best interest of the Client first.

Investably may engage in a revenue-sharing arrangement with a third-party financial technology provider to offer a suite of cash and lending management solutions, including high-yield savings accounts, securities-backed lines of credit, and related financial services. As part of this arrangement, Investably may elect to receive compensation which presents a conflict of interest. Such compensation is paid by the third-party provider and is separate and apart from the advisory fees clients pay to Investably.

Additionally, Michelle Gordon is the sole owner of Happy Wealthy Me LLC, which provides financial wellness and education, and is the sole owner of Lendbly LLC, a marketing firm. She spends less than 2% of her time on each of these businesses.

Clients are under no obligation to use any products or services offered through these affiliated businesses, and are free to select any other provider of these services. These affiliations create a conflict of interest, as the compensation Michelle Gordon and her affiliated businesses receive from clients who choose to use these services creates an incentive to recommend them. Investably LLC addresses this conflict by disclosing it here and by requiring that all recommendations remain consistent with the firm's fiduciary duty to act in each client's best interest.

ITEM 5 — ADDITIONAL COMPENSATION

Michelle Gordon receives commissions on the businesses described above in Item 4. She does not receive any performance-based fees.

ITEM 6 — SUPERVISION

Since Michelle Gordon is the sole owner and investment adviser representative of Investably, she is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. She will adhere to the policies and procedures as described in the firm's Compliance Manual. She may be reached at Michelle@investably.com or 689-220-1358.

ITEM 7 — REQUIREMENTS FOR STATE-REGISTERED ADVISORS

Ms. Gordon has not been involved in any arbitration claim alleging damages in excess of $2,500, or any civil, self-regulatory organization, or administrative proceeding involving an investment or investment-related business, fraud, false statement(s) or omissions, theft, embezzlement or other wrongful taking of property, bribery, forgery, counterfeiting, or extortion, or dishonest, unfair or unethical practices. Ms. Gordon has never been the subject of a bankruptcy petition.