

Form ADV Part 2A

Fractal Financial Design, LLC

221 West Liberty Street
Medina, Ohio 44256

Phone: (330) 304-2736

Published on May 23, 2025

This brochure provides information about the qualifications and business practices of Fractal Financial Design, LLC. If you have questions about the contents of this brochure, please contact us directly at the phone numbers provided above. The information in this brochure has not been approved by the United States Securities and Exchange Commission or by any state securities authority but is being provided by the requirements put forth in the Securities Act of 1940.

Additional information about Fractal Financial Design, LLC is also available on the SEC's website at www.adviserinfo.sec.gov under the firm's CRD number 297518.

Material Changes from Prior Brochure

This filing is an other-than-annual amendment to the firm's prior brochure last updated on March 25, 2025. There is a material change in billing methods as the firm switched to receiving payments at the start of a quarter.

Table of Contents

About Our Advisory Business (Item 4)	Page 3
Fees and Compensation (Item 5)	Page 3
Performance Based Fees (Item 6)	Page 4
Types of Clients (Item 7)	Page 4
Methods of Analysis, Strategies and Risk (Item 8)	Page 4
Disciplinary Information (Item 9)	Page 5
Other Financial Industry Activities and Affiliations (Item 10)	Page 5
Participation in Client Transactions and Personal Transactions (Item 11)	Page 5
Brokerage Practices (Item 12)	Page 5
Review of Accounts (Item 13)	Page 6
Client Referrals or Other Compensation (Item 14)	Page 6
Custody of Assets (Item 15)	Page 6
Investment Discretion (Item 16)	Page 7
Voting on Client Securities (Item 17)	Page 7
Financial Information (Item 18)	Page 7
State Requirements (Item 19)	Page 7
Brochure Supplement for Brett M Thomas, CPA	Page 8

About Our Firm (ADV 2A, Item 4)

Fractal Financial Design, LLC, is an independent investment firm aimed at providing investment strategies for a younger, currently employed high-net-worth clientele. The firm is organized as a Limited Liability Company in the State of Ohio founded in 2018 and is owned by its founder and principal, Brett M Thomas, CPA.

Our firm provides individualized active-trading strategies for select clients customized around a variety of goals through our portfolio management. All advice is tailored individually to each client based on the client's specific requirements and financial position. The firm had approximately \$31,427,000 under management as of December 31, 2024.

Clients that participate in our portfolio management service are contracted for us to manage their accounts on a discretionary basis. Transactions are made at the discretion of the investment advisor (IA), and clients are strongly discouraged from making requests or demands to be invested or removed from a particular security or sector. Clients that make excessive stipulations on their accounts or who expect unreasonable performance goals may be withdrawn from the service at the advisor's discretion.

Fees and Compensation (ADV 2A, Item 5)

Portfolio management service fees are billed based on individually contracted rates per client, as a percentage of assets under management (AUM) not to exceed 1.5% of AUM per annum, negotiated individually depending on client need and portfolio size. Typically, these fees are assessed quarterly as a tiered structure (for instance, 0.3125% on the first \$500,000; 0.25% on assets between \$500,000-\$1,000,000, 0.2125% on assets between \$1,000,000-\$2,500,000, and 0.15% on assets above \$2.5M) based on the value of the portfolio at market close on the last trading day of the preceding quarter. Assets brought in during the quarter are valued as of the date of transfer and may be billed at the time of transfer using the applicable billing methods. Outside of significant contributions or withdrawals, these fees are not adjusted and are not negotiable. Other payment arrangements may be designed into individual contracts.

An annual flat account maintenance fee will be levied on each active account. This fee addresses per-account administrative costs such as portfolio reporting services and data storage by our independent vendor. This fee amount for the 2025 calendar year is \$75.00.

Fees are withdrawn directly from the accounts under management at the start of each quarter from the account that provides the best tax advantage to the client unless otherwise agreed. Prior to withdrawal, an invoice is provided electronically to the client detailing the fees and the period. Should a client terminate services prior to the end of a quarter, any unearned portion of fees is refunded within thirty (30) days.

Clients may encounter other fees levied by the independent brokerage services used as custodians while under management with our firm, such as sales commissions and mutual fund fees. We are not in control of these fees, though we will do our best to make our clients aware of them. Minimizing these fees is a part of our brokerage evaluation process. Please see **Brokerage Practices** for further detail on this.

No other compensation (commission, referral bonus, etc.) will be accepted. It is a violation of our company's ethics to be paid by any party other than our client.

Performance Based Fees and Side-By-Side Management (ADV 2A, Item 6)

Our firm does not accept performance-based compensation or share in any gains per transaction. Our only fee increases come from an increase in client account values.

We do not engage in Side-by-Side management (different accounts billed using different methods) – all actively managed portfolios are charged utilizing an assets-under-management calculation to remove any conflicts of interest.

Types of Clients (ADV 2A, Item 7)

Our firm provides investment services for individuals, estates, trusts and business entities. Clients are accepted based on individual fit with our investment philosophy and their investment goals, as determined through initial interviews and consultations.

Methods of Analysis, Investment Strategies and Risk of Loss (ADV 2A, Item 8)

Our firm conducts its own independent research on the securities purchased in client accounts. Securities are analyzed based on their past, current and potential future income, overall stability and their current “value” versus their expected price.

Growth securities that are viewed to have sufficient current short- to mid- term value are selected for investment. Income securities are chosen based on their current yield versus their historical yields, with an emphasis on capturing a current capital devaluation to increase long-term performance. Stocks purchased for growth may be traded actively during more volatile market periods, which can incur additional trading fees and potential tax consequences along with their gains or losses.

We sometimes utilize derivative investments in order to generate additional income from particular types of securities, which helps to increase the yield on growth securities that have not reached their targets. Our firm focuses on covered calls, which provide additional income to the portfolio while adding no additional risk except for a cap on potential profits.

We invest only in exchange-traded common stocks (with their accompanying derivatives, as above), preferred stocks, ETFs, mutual funds and bonds to preserve liquidity and reduce risk. Any investment is subject to inherent market risk, which is why portfolios are built with many different pieces designed to offset one another. In this way, a long-term portfolio will routinely have some profit to harvest while other items are recovering. The preferred stocks and bonds are also subject to inherent interest rate risks, which are largely covered by holding the securities until stated maturity.

Though a diverse portfolio and careful asset grooming greatly reduces these risks, we cannot guarantee the specific performance of any one individual investment in the long term, nor the behavior of the market as a whole in the short term. Loss of market value is a possibility accepted by any investor.

Disciplinary Information (ADV 2A, Item 9)

No disciplinary actions have been filed against our firm, its principal, or any employee. There have never been any criminal or civil actions, suits or violations from the SEC or any other self-regulatory organization such as the Accountancy Board of Ohio or the Department of the Treasury.

Other Financial Industry Activities and Affiliations (ADV 2A, Item 10)

The firm, its principal, and its employees have no other connections to the financial industry at large. We are not licensed as, nor are we seeking licenses to be broker/dealers, futures commission merchants, commodity pools, etc.

Code of Ethics, Participation in Client Transactions, Personal Trading (ADV 2A, Item 11)

Our firm has adopted a code of ethics based on the codes put forth by the SEC and the AICPA. All employees, whether in direct contact with the investment portion of our business or not, must adhere to this code. The code covers (among other items) insider trading, the handling of sensitive information and documents, and client confidentiality. A copy of this code will be provided free of charge to any client or prospective client upon request.

Employees and related persons of our firm do purchase in their own accounts many of the investments that we recommend for clients. As all investments are exchange-traded, these transactions have a minimal (if any) effect on transactions in client accounts. To ensure the best treatments are passed on to our clients, multiple transactions of the same security are handled for all clients first and employees second wherever possible.

Brokerage Practices (ADV 2A, Item 12)

Our firm regularly recommends and uses one discount brokerage firm to provide custody services for our client accounts. We evaluate this company annually to assure that it is providing an appropriate blend of service to our clients in execution, documentation and security for the cost that it charges in commissions.

We receive no extra benefits or payment from our brokerage of choice, and do not have any control over the commission fees that it charges to our clients. We have no contractual relationship with the company, and it provides no investment research, securities or services that would bias our decision.

Though we specifically recommend and attempt to use a single brokerage for custody, it is impossible to guarantee that our recommended brokerage will execute every transaction in the most efficient method possible. We evaluate this execution speed and reliability as part of our annual due diligence (or more frequently if need arises) to make sure that our clients are receiving the best service possible. Not every firm requires clients to use a specific brokerage, and it is possible that doing so can potentially cost a client unnecessary money if the chosen brokerage executes a trade less favorably. However, since all of our chosen investments are widely traded across a variety of electronic exchanges, this risk is extremely minimal.

When our recommended brokerage is unavailable (for instance, in the case of a 401(k) plan), we are willing to use other brokerage companies that already custody the funds.

Because we do not have a contractual relationship with the brokerage we choose, we cannot prevent a client from purchasing/selling securities or move funds into/out of the portfolio outside of our control. These activities are strongly discouraged and may significantly interfere with investment strategies by altering the cash available in portfolios while trading. They may also cost the client more money in commissions through unnecessary or poorly-executed trades (by requesting certain exchanges or orders of execution), or unfavorable prices by choosing improperly timed actions.

Because a security may be useful for more than one client at a time, securities are sometimes purchased (or more frequently, sold) in block or aggregate trades. Trades executed in this manner provide additional opportunities for securing successful limits on more thinly traded securities or maintaining more consistent pricing for several clients in a volatile position.

Review of Accounts (ADV 2A, Item 13)

Accounts under management are reviewed at a near-daily rate by the IA. Routine detailed examination and complex evaluation is performed monthly to quarterly by both the IA and staff to measure specific performance goals and determine what actions (if any) are needed. Clients are provided monthly statements by the independent brokerage firm throughout the year and a quarterly review is provided through our independent reporting vendor, and performance discussed with the client routinely by the IA. Additional reports can be provided (and results discussed) at any time if the client has specific concerns or needs.

Client Referral and Other Compensation (ADV 2A, Item 14)

Our firm receives no benefit from referrals provided to outside parties, and we do not pay for referrals either from clients or other professionals.

Custody of Assets (ADV 2A, Item 15)

Our firm does not have direct custody of any assets, except for the ability to withdraw fees from client accounts.

Clients receive statements directly from the independent brokerage company that has custody, and we do not prepare nor provide similar statements. Clients are urged to carefully review these statements, as well as the trade confirmations that come from purchases and sales in their individual accounts.

Investment Discretion (ADV 2A, Item 16)

All clients that desire portfolio management services must give the Investment Advisor discretion over the account to trade on their behalf. This authority may be expanded to allow the IA to oversee routine distributions or send unusual distributions to a client via verbal or

written instruction if the client approves. This authority is managed by the initial account application and may be expanded by subsequent powers of attorney.

Voting on Client Securities (ADV 2A, Item 17)

Our firm does not vote for clients on their securities, and (outside of very rare circumstances) does not attempt to influence a client's participation.

Other Financial Disclosures (ADV 2A, Item 18)

There are no financial conditions that could impair our ability to meet our commitments to our clients or creditors. Neither the firm, its principal nor its employees have been the subject of a bankruptcy petition.

Requirements for State-Registered Advisers (ADV 2A, Item 19)

- A. **Management** – Management is conducted solely by Brett Thomas, whose background is discussed in detail in the 2B supplement of this ADV.
- B. **Other Active Business Interest** – Fractal Financial is not directly affiliated with or engaged in any other business.
- C. **Performance Based Fees** – Our firm does not accept performance-based fee compensation.
- D. **Material Issue Disclosures** – No officer has been investigated, sanctioned or found guilty of any offense relating to financial or professional malfeasance of any kind.
- E. **Other Relationship Disclosures** – No officer has a relationship to any issuer of securities or custodian that could provide any form of outside compensation.

Form ADV Part 2B

Brochure Supplement for
Brett M Thomas, CPA

Fractal Financial Design, LLC

221 West Liberty Street

Medina, Ohio 44256

Phone: (330) 304-2736

Published on March 25, 2025

This brochure supplement provides information about Brett M Thomas, CPA that supplements the brochure of Fractal Financial Design, LLC. You should have received a copy of that brochure. Please contact our offices if you have not received the brochure or if you have questions about the contents of this supplement.

Background and Business Experience

Brett M Thomas, 43, graduated with his BS in Accountancy from the University of Akron. He has been working in the investment field since 2002 with a focus on retirement planning and design as an accountant, planner, RIA and compliance manager. This invaluable experience across many facets of the industry has led to his skills designing and selecting assets for a diverse group of needs.

Brett is a Certified Public Accountant registered with the State of Ohio. CPAs are licensed and regulated by their state boards of accountancy. Ohio requires a minimum college education of 150 credit hours with at least a baccalaureate degree and a concentration in accounting, a minimum experience level of three years of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA, and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, the State of Ohio requires the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period).

Disciplinary Information

There are no criminal or civil actions either past or pending.

There are no administrative proceedings for any financial regulatory agency either past or pending.

There are no self-regulatory organization proceedings past or pending.

Other Business Activities

Brett is engaged as a tax preparer for clients through Fractal Financial Design, LLC. He also serves in an appointed position as the Finance Director of Medina County, Ohio.

Supervision

Brett is the principal adviser of the firm and is not supervised.

Requirements for State-Registered Advisers

A. Brett has not been involved in any arbitration, civil, self-regulatory organization or administrative proceedings involving any of the following: investments or investment-related activities; fraud, false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices.

B. Brett has never been the subject of a bankruptcy petition.

