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Form ADV Part 2A Appendix 1
Wrap Fee Program Brochure

April 25, 2022

This wrap fee program brochure provides information about the qualifications and business practices of Florida Financial Advisors, Inc. (FFA). If you have any questions about the contents of this brochure, please contact us at (813) 333-1683 or email us at info@floridafa.com.

The information in this brochure has not been approved or verified by the United StatesSecurities and Exchange Commission or by any state securities authority. Additional information about Florida Financial Advisors is also available on the SEC's website at https://www.adviserinfo.sec.gov. Florida Financial Advisors *CRD number is: 288811.*

Registration as an investment adviser does not imply a certain level of skill or training, it is used only to reflect the status of the firm with respect to Section 203 of theInvestment Advisers Act of 1940.

Item 2: Material Changes

Florida Financial Advisors has not yet filed an annual updating amendment to this Wrap Fee Program Brochure, therefore has the following material changes to this brochure to report.

The firm has added written acknowledgement of fiduciary status language.

Item 3 Table of Contents

Section headings are keyed to SEC form ADV 2A. If sections of the form are not applicable, this document will so state.

Item 4: Advisory Business

A. Description of the Advisory Firm

Florida Financial Advisors, Inc. (hereinafter "FFA") is a registered investment adviser subject to the jurisdiction of the Securities and Exchange Commission.

FFA provides portfolio management to clients under this wrap fee program as sponsor and portfolio manager. Portfolio management fees are withdrawn directly from the client's accounts with client's written authorization.

Fees are paid in arrears. FFA uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

Clients may terminate the agreement without penalty, for full refund of FFA's fees, within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

B. Contribution Cost Factors

The program may cost the client more or less than purchasing such services separately. There are several factors that bear upon the relative cost of the program, including the trading activity in the client's account, the adviser's ability to aggregate trades, and the cost of the services if provided separately (which in turn depends on the prices and specific services offered by different providers).

C. Additional Fees

FFA will wrap third party fees (i.e., custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.) for wrap fee portfolio management accounts. FFA will charge clients one fee, and pay all transaction fees using the fee collected from the client. Accounts participating in the wrap fee program are not charged higher advisory fees based on trading activity, but clients should be aware that FFA has an incentive to limit trading activities for those accounts since the firm absorbs those transaction costs.

Certain other fees are not included in the wrap fee and are paid for separately by the client. These include, but are not limited to, margin costs, charges imposed directly by a mutual fund or exchange traded fund, fees associated with "step out" transactions if the account uses different custodians or broker-dealers, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

D. Compensation of Client Participation

Neither FFA, nor any representatives of FFA receive any additional compensation beyond advisory fees for the participation of client's in the wrap fee program. However, compensation received may be more than what would have been received if client paid separately for investment advice, brokerage, and other services. Therefore, FFA may have a financial incentive to recommend the wrap fee program to clients.

E. Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;

- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.
- Give you basic information about conflicts of interest.

Item 5: Account Requirements and Types of Clients

FFA does not impose a minimum account size or a minimum annual fee for its Investment Management Services. Some services and fee structures may not be suitable for accounts or portfolios of all sizes due to the impact that operating costs would have on performance. FFA negotiates fees on a client-by-client basis. The feecharged will be stipulated within each client's investment advisory agreement and it applies to the assets coveredunder the agreement.

Individual third-party money managers have their own stated minimums which vary by manager and strategy.

Item 6: Portfolio Manager Selection and Evaluation

A. Selecting/Reviewing Portfolio Managers

FFA will select outside portfolio managers for management of this wrap fee program. FFA relies on the custodians for the first approval of portfolio managers. In addition, when FFA recommends third party outside portfolio managers, FFA will review to the extent information is available: the firm's background, manager's background, industry experience, management style, performance record, client agreements and contracts, and current regulatory filings available. You should be aware that our firm cannot actively monitor outside portfolio managers conflicts of interest, daily trading activity and other operational issues.

FFA allows their advisors to act as Portfolio Managers. As Portfolio Managers, advisors monitor client program accounts and make recommendations for (or executing trades in) investments consistent with the clients' investment objectives. FFA does not conduct peer comparison performance review or analysis of its portfolio managers (advisors). This constitutes a conflict of interest. FFA addresses this conflict by monitoring the portfolio managers' performance relative to the stated account investment objectives, relative performance benchmarks, etc. There is no guarantee that the recommendations or trades will meet a Client's investment objective over any given timeframe.

FFA will use industry standards to calculate portfolio manager performance. A third party reviews the performance information to determine and verify its accuracy and compliance with presentation standards. The performance information is reviewed by the third-party advisor.

B. Advisory Business

FFA offers ongoing wrap fee portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. FFA creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Determine investment strategy
- Personal investment policy
- Asset allocation
- Asset selection
- Assessment of risk tolerance
- Regular portfolio monitoring

FFA evaluates the current investments of each client with respect to their risk tolerance levels and time horizon.

Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Portfolio management accounts participating in the wrap fee program will not have to pay for transaction or trading fees. FFA will charge clients one fee, and pay transaction fees using the advisory fee collected from the client. Certain other fees are not included in the wrap fee and are paid for separately by the client. These include, but are not limited to, margin costs, charges imposed directly by a mutual fund or exchange traded fund, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Accounts participating in the wrap fee program are not charged higher advisory fees based on trading activity, but clients should be aware that FFA has an incentive to limit trading activities for those accounts since the firm absorbs those transaction costs. To address this conflict, FFA will always act in the best interest of its clients consistent with its fiduciary duty as an investment adviser.

Client Tailored Services and Client Imposed Restrictions

FFA offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client's current situation (income, tax levels, and risk tolerance levels). Clients are not permitted to impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

Wrap Fee Programs

As discussed herein, FFA sponsors and acts as portfolio manager for this wrap fee program. FFA manages the investments in the wrap fee program, but does not manage those wrap fee accounts any differently than it would manage non-wrap fee accounts The fees paid to the wrap account program will be given to FFA as a management fee.

Amounts Under Management

FFA has the following assets under management:

-
- $61,876,000 Discretionary
- $0 Non-Discretionary
- Date Calculated December 31, 2021

Performance-Based Fees and Side-By-Side Management

FFA does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Clients paying a performance-based fee should be aware that investment advisers have an incentive to invest in riskier investments when paid a performance-based fee due to the higher risk/higher reward attributes.

Methods of Analysis & Investment Strategies

Methods of Analysis

FFA's methods of analysis include Charting analysis, Cyclical analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis and Technical analysis.

Charting analysis involves the use of patterns in performance charts. FFA uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.
Technical analysis involves the analysis of past market data; primarily price and volume.

Investment Strategies
FFA uses long term trading and short-term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Material Risks Involved
Methods of Analysis
Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two- fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that
emerge over time.

Investment Strategies
Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the

time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long-term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and
taxes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Risks of Specific Securities Utilized
Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.
Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

Non-U.S. investments present certain additional risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Use of Third Party Outside Portfolio Managers. FFA may select certain third party outside portfolio managers to manage a portion of its clients' assets. In these situations, FFA continues to conduct ongoing due diligence of such managers, but such recommendations generally rely on the third party outside portfolio managers' ability to successfully implement their investment strategies. In addition, FFA generally may not have the ability to supervise the third party outside portfolio managers on a day-to-day basis.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Voting Client Securities (Proxy Voting)

FFA will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 7: Client Information Provided to Portfolio Managers

All client information material to managing the portfolio (including basic information, risk tolerance, sophistication level, and income level) is provided to the portfolio manager. The portfolio manager will also have access to that information as it changes and is updated.

Item 8: Client Contact with Portfolio Managers

FFA does not restrict clients from contacting portfolio managers. FFA's representatives can be contacted during regular business hours using the information on the Form ADV Part 2B cover page.

Item 9: Additional Information

A. Disciplinary Action & Other Financial Industry Activities

Criminal or Civil Actions

There are no criminal or civil actions to report.

Administrative Proceedings

There are no administrative proceedings to report.

Self-Regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Registration as a Broker/Dealer or Broker/Dealer Representative

Some of our advisors may be registered representatives. Advisors who are registered representatives may also be paid based on the services they provide. In cases where we receive additional payment, there may be a conflict of interest. At all times, you are free to choose an outside agency to avoid the possibility of there being a conflict of interest.

Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither FFA nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Some of our advisors may be insurance agents. Advisors who are insurance agents may also be paid based on the services they provide. In cases where we receive additional payment, there may be a conflict of interest. At all times, you are free to choose an outside agency to avoid the possibility of there being a conflict of interest.

FFA always acts in the best interest of the client; including the sale of commissionable products or services to advisory clients. Clients are in no way required to utilize the services of any representative of FFA in connection with such individual's activities outside of FFA.

Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

FFA may enter directly into sub-advisory relationships with independent registered investment advisory firms (“subadvisors”) on behalf of its clients as part of our discretionary services. We are not compensated for that selection. Prior to entering into a relationship, FFA performs a due diligence review of the subadvisor. This review includes, but is not limited to, the review of regulatory filings, investment offerings, and the performance of the strategies considered. When a strategy offered through a subadvisor is appropriate for a client of FFA, the client will be given the subadvisor’s Form ADV, Part 2A and 2B, Privacy Notice, and any other information that may be relevant or informative to the client. The client will not engage the subadvisor directly; the client’s advisory relationship remains with FFA as set forth in the client’s Investment Advisory Agreement. Sub-advisors are paid a portion of the fee that you pay to us.

FFA may also offer access to third party outside portfolio managers. When recommending third party portfolio managers, FFA will review to the extent information is available: the firm’s background, manager’s background, industry experience, management style, performance record, client agreements and contracts, and current regulatory filings available. See Item 6. FFA will monitor subadvisor and third party outside portfolio managers’ performance relative to the stated account investment objectives, relative performance benchmarks, etc.

There is no guarantee that the recommendations or trades will meet a Client’s investment objective over any given timeframe.

B. Code of Ethics, Client Referrals, and Financial Information

Code of Ethics

FFA has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. FFA’s Code of Ethics is available free upon request to any client or prospective client.

Recommendations Involving Material Financial Interests

FFA does not recommend that clients buy or sell any security in which FFA or a related person has a material financial interest.

Investing Personal Money in the Same Securities as Clients

From time to time, representatives of FFA may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of FFA to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. FFA will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client’s disadvantage when similar securities are being bought or sold.

Trading Securities At/Around the Same Time as Clients’ Securities

From time to time, representatives of FFA may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of FFA to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, FFA will never engage in trading that operates to the client's disadvantage if representatives of FFA buy or sell securities at or around the same time as clients

Frequency and Nature of Periodic Reviews

Accounts are reviewed at least annually with regard to clients' respective investment policies and risk tolerance levels.

Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Content and Frequency of Regular Reports Provided to Clients

Each client will receive a quarterly account statement from the custodian.

Aggregating (Block) Trading for Multiple Client Accounts

If FFA buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, FFA would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. FFA would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Economic Benefits Provided by Third Parties for Advice Rendered to Clients

FFA does not receive any economic benefit, directly or indirectly from any third party for advice rendered to FFA clients.

Compensation to Non – Advisory Personnel for Client Referrals

FFA does not compensate non-advisory personnel (solicitors) for client referrals.

Balance Sheet

FFA neither requires nor solicits prepayment of more than $1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

FFA does not have any financial condition that would impair its ability to meet contractual commitments to clients.

Bankruptcy Petitions in Previous Ten Years

FFA has not been the subject of a bankruptcy petition.

Item 10: Requirements for State Registered Advisors

Principal Executive Officers & Management Persons, Their Formal Education & Business Background

- President & CEO: Jason Mickool
- Vice President & PIC:
    - Nicholas Sowers
    - Stephen Schmitt
    - Zachary Jaret
    - Tom Nickerson
    - Gino Lavorgna
    - Daniel Raps-Huffman

*Education and business background for management personnel can be found on the individual's Form ADV Part 2B Brochure Supplement.

Other Businesses in which this advisory firm or its personnel are engaged in and time spent

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

Calculation of performance-based fees and degree of risk to clients

FFA does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Material Disciplinary Disclosures for Management Persons of this firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

Material Relationships that management persons have with Issuers of Securities

Neither FFA nor our employees have any relevant material relationships with issuers of securities.