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Form ADV Part 2A Brochure

This Brochure provides information about the qualifications and business practices of Horowitz & Company, Inc. If you have any questions about the contents of this Brochure, please contact us at (954) 349-0800 or info@horowitzco.com.

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.

Horowitz & Company, Inc. is a Registered Investment Adviser. Registration of an investment adviser does not imply any specific level of skill or training. This Brochure provides information about Horowitz & Company, Inc. to assist you in determining whether to retain Horowitz & Company, Inc. as your investment adviser.

Additional information about Horowitz & Company, Inc. is available on the SEC's website at www.adviserinfo.sec.gov. The CRD number for Horowitz & Company, Inc. is 106737.

Item 2 - Material Changes

This section provides a summary of material changes that were made to this Brochure since the last annual update filed by Horowitz & Company, Inc. ("Horowitz & Company"). We review and update our Brochure at least annually to make sure that it remains current. From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by the securities regulators.

The purpose of this section is to inform you of any material changes since the previous annual updating amendment filing of this Brochure submitted on March 14, 2024. On March 31, 2025, we submitted our annual updating amendment for our fiscal year ending 2024.

- The minimum investment for eNVESTOLOGY® is now $25,000 instead of $10,000 (see Items 4 and 7 of our brochure).
- We have also updated Items 4, 5, 7, 8, 19, and 11 regarding the selection or recommendation of other advisers. From time to time, we may select or recommend the services, model portfolios, or programs of one or more unaffiliated, independent third-party investment advisers ("sub-advisers") to manage clients' investment portfolios or a portion of their investment portfolios. Generally, the fees charged by sub-advisers are separate and in addition to the fees we charge for our supervision of the assets managed by the sub-adviser and are payable in accordance with the agreements you sign with us and/or the sub-adviser. The total combined fees charged by us and the sub-adviser will not exceed 2% of the assets under management and supervision.

Additionally, due to regulatory requirements regarding the amount of regulatory assets under management, we have transitioned our registration from state registration to federal registration. This change in registration status does not change our relationship with you; it simply means that we are now subject to the oversight of the U.S. Securities and Exchange Commission ("SEC"). Our registration with the SEC became effective on June 30, 2025. Registration is not an endorsement of our firm by the SEC or any securities regulators, and it does not mean we or our associated persons have achieved a specific level of skill or ability. As part of the transition, we have updated our disclosure brochure to remove certain references to state-specific requirements.

We strongly encourage you to carefully review the full brochure. If you have any questions or if you would like a copy of this Brochure at any time, free of charge, contact us at (954) 349-0800 or at info@horowitzco.com. Additionally, you may view the most current Brochure online at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 3 - Table of Contents

Item 4 - Advisory Business

Description of Advisory Services and Fees
Horowitz & Company, Inc. ("Horowitz & Company") is a registered investment adviser based in Ft. Lauderdale, Florida. We are a corporation, formed under the laws of the State of Florida. Andrew A. Horowitz, President and Chief Compliance Officer, is the sole owner of Horowitz & Company. Horowitz & Company has been providing investment advisory services since 1991.

Currently, we offer the following investment advisory services, personalized to each individual Client. You may see the term "associated person" throughout this Brochure. As used in this Brochure, this term refers to anyone from our firm who is an officer, employee, or any individual providing investment advice on behalf of our firm, including Mr. Horowitz. Such persons are properly registered as investment adviser representatives in applicable jurisdictions where required. Currently, Mr. Horowitz is the sole investment adviser representative of our firm.

Financial Planning and Consulting Services
We offer financial planning services, which typically involve providing a variety of advisory services to Clients regarding the management of their financial resources based upon an analysis of their individual needs. These services can range from broad-based financial planning to consultative or single-subject planning. If you retain our firm for financial planning services, we will meet with you to gather information about your financial circumstances and objectives. We may also use financial planning software to determine your current financial position and to define and quantify your long-term goals and objectives. Once we specify those long-term objectives (both financial and non-financial), we will develop shorter-term, targeted objectives. Once we review and analyze the information you provide to our firm and the data derived from our financial planning software, we will deliver a written plan to you, designed to help you achieve your stated financial goals and objectives.

Financial plans are based on the financial information you provide to us regarding your financial situation at the time we present the plan or recommendations to you. You must promptly notify our firm if your financial situation, goals, objectives, or needs change.

You are under no obligation to act on our financial planning recommendations. Should you choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services or associated persons. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

We also offer consultation and administrative services regarding specific investment and financial concerns of the Client. Consulting services may include advice on only an isolated area of concern or a specific topic, as agreed upon with the Client. Topics may include, but are not limited to, risk assessment/management, investment planning, educational planning (e.g., 529 plan set up), financial organization, or financial decision-making and negotiation, among others. Additionally, Horowitz & Company provides advice on non-securities matters. Generally, this is in connection with the rendering of estate planning, insurance, tax planning, and/or advice on annuities and other insurance products. However, consulting advice is not limited to these non-securities matters. Written plans or reports are generally not provided for consulting-only services.

Note: Horowitz & Company is not an accounting firm, and no individuals associated with the firm are certified public accountants or attorneys. Information related to tax or legal consequences that is provided as part of a plan is for informational purposes only. Clients are instructed to contact their tax professionals or attorneys for tax or legal advice.

Portfolio Management Services

Our firm offers discretionary portfolio management services to our Clients. Discretionary portfolio management means we will make investment decisions and place buy or sell orders in your account without contacting you. These decisions would be made based on your stated investment objectives. Although Horowitz & Company allows the Client to impose restrictions on investing in certain investments or types of securities, it is important to note that restrictions imposed by Clients may affect the composition and performance of portfolios. For these reasons, the performance of portfolios within the same investment objective may differ, and Clients should not expect that the performance of their portfolios will be identical to the average Client of the Strategy. If you wish, you may limit our discretionary authority by, for example, setting a limit on the type of securities that can be purchased for your account. Simply provide us with your restrictions or guidelines in writing.

In very limited circumstances, at our sole discretion, we may enter into non-discretionary advisory agreements with Clients. Non-discretionary portfolio management service means that we must obtain your approval prior to making any transactions in your account.

Our investment advice is tailored to meet our Clients' needs and investment objectives. If you decide to hire our firm to manage your portfolio, we will gather your financial information. The information we gather will help us implement one or more strategies described below that will be specific to your goals, whether we are actively investing for you or simply providing you with advice.

TDI MANAGED GROWTH STRATEGY (TDIMG): This is an aggressive and active strategy that may include momentum (short-term) trading, short positions, and may have margin trading associated with this strategy. TDIMG may include long-term and short-term purchases, trading, and options, as well as other strategies. Active strategies may entail additional risk due to a greater frequency of transactions, which may involve additional brokerage fees, transaction costs, and taxes. Also, strategies that use options may entail additional risk, as losses may exceed those experienced in the underlying stock. The strategy utilizes quantitative, fundamental, and technical analyses in the stock selection process. In addition, hedging strategies may be used depending on market conditions. Swing-trading, intra-day trading, and trading leveraged exchange traded funds are some of the tools that are available to be used within this strategy. Components of the strategy can change at any time at the discretion of Horowitz & Company. Investing in securities under this strategy involves a risk of loss that the Client must be prepared to bear. The minimum investment is $50,000 through an account to be opened by the Client and maintained with Interactive Brokers.

eNVESTOLOGY®: Portfolio allocations are designed around the Client's goals, risk tolerance, and time horizon. Through this strategy, Horowitz & Company helps the Client determine the "best-fit" portfolio based on the Client's input to design a plan consistent with the Client's long-term investment goals through an online risk profiling tool. The strategy seeks to create a diversified mix of correlated and uncorrelated asset classes in an attempt to reduce portfolio volatility. The goal is to potentially reduce exposure to idiosyncratic risks that are present in the markets, dependent on the Client's risk tolerance and time horizon. Portfolios are rebalanced throughout the year to promote profit-taking when available, while reinvesting back into some of the underperforming asset classes. Within eNVESTOLOGY® portfolios, passive investing strategies utilizing exchange traded funds may be utilized for markets and sectors that Horowitz & Company considers to be efficient. At the same time, Horowitz & Company believes that active investing strategies through the use of mutual funds can be beneficial in markets that may be inefficient or less liquid. Investing in securities under this strategy involves a risk of loss that the Client must be prepared to bear. Investments in this strategy focus on load-waived and no-load investment products such as mutual funds and exchange traded funds. The minimum investment is $25,000 through an account to be opened by the Client and maintained with Charles Schwab & Co., Inc. (“Schwab”).

GLOBAL ALLOCATIONS: Portfolio allocation decisions are dependent on Horowitz & Company’s macroeconomic research and outlook. This asset allocation strategy is regularly reassessed and adjusted in an attempt to make it relevant to the current market environment. Portfolios can be structured using analytic and philosophical measures. A combination of strategic and tactical asset allocation forms the basic strategy in Horowitz & Company’s recommendations. Historic and projected returns may be utilized to determine the "Portfolio Model" as defined by Modern Portfolio Theory, Mean-Variance Optimization, Technical, Fundamental, and Quantitative theories, and other potential investment disciplines. Portfolios are designed based on the time horizon and risk tolerance of each Client. Depending on that risk and time horizon, the goal is to potentially reduce exposure to idiosyncratic risks that are present in the markets. The strategy looks to create a diversified mix of correlated and uncorrelated asset classes in an attempt to reduce portfolio volatility. Mutual funds and exchange traded funds are the primary investments used in this strategy; however, other investments may be utilized depending on the Client’s investment goals. Investing in securities under this strategy involves a risk of loss that the Client must be prepared to bear. The suggested minimum investment is $500,000 through an account to be opened by the Client and maintained with Charles Schwab.

Selection or Recommendation of Other Advisers

As part of our overall portfolio management services*,* from time to time, we may select or recommend the services, model portfolios, or programs of one or more unaffiliated, independent third-party investment advisers (“sub-advisers”) to manage clients’ investment portfolios or a portion of their investment portfolios. Some or all of the assets in the client’s account(s) may be managed using one or more model portfolios developed by the sub-adviser. Generally, clients may not impose restrictions on investing in certain securities or types of securities in the sub-adviser’s models/programs. All sub-advisers recommended by our firm must either be registered as investment advisers or exempt from registration requirements in the jurisdiction in which the client resides. When selecting or recommending a particular sub-adviser, model portfolio, or program, the client's best interest will be the main determining factor. Other factors that we take into consideration when selecting or recommending sub-advisers include, but are not limited to, the sub-adviser’s performance history, methods of analysis, fees, the client’s financial needs, investment goals, risk tolerance, and investment objectives. We will regularly monitor the sub-adviser’s performance to ensure their management and investment style remains aligned with the client’s investment goals and objectives. In some cases, the client may be required to execute a separate advisory agreement or trading authorization with certain sub-advisers or the account custodian for certain managers available through the custodian’s platform.

Types of Investments

Horowitz & Company advises on various types of securities, including equities, certificates of deposit, bonds, exchange traded funds, annuities, options, or other derivatives, among others, including legacy interests in partnerships investing in real estate and/or other existing investments you may hold at the inception of the advisory relationship, or other investments suitable to your individual circumstances or preferences, including fixed annuity or other insurance products.

If you engage us for portfolio management services, we will monitor your portfolio’s performance regularly and rebalance the portfolio whenever necessary, as changes occur in market conditions and/or your financial circumstances.

Pension Consulting Services
Horowitz & Company offers consulting and advisory services for employer-sponsored retirement plans that are designed to assist plan sponsors/trustees of employee benefit plans (collectively the "Client"). Horowitz & Company may also assist the Client with enrollment and/or providing investment education to plan participants and beneficiaries. Clients may engage us for one or more of the following services.

Selection of Investment Vehicles
Horowitz & Company will review various investments, consisting of one or more of the following: individual equities, bonds, other investment products, exchange traded funds (ETFs), and mutual funds (both index and managed) to determine which of these investments are appropriate to implement the plan's Investment Policy Statement or other stated parameters. The number of investments to be recommended will be determined by the Client, based on the plan's Investment Policy Statement or other stated parameters.

Monitoring of Investment Performance
Client investments will be monitored based on the procedures and timing intervals outlined in the plan's Investment Policy Statement or other stated parameters and as agreed upon in the written agreement between the Client and Horowitz & Company. However, Horowitz & Company will not be involved in any way in the purchase or sale of these investments. Instead, Horowitz & Company will monitor the Client's portfolio and will make recommendations to the Client as market factors and the Client's needs dictate.

Employee Communications
For pension, profit sharing, and 401(k) plans where the individual account participant exercises control over assets in their own account (hereinafter ''self-directed plans''), Horowitz & Company may also provide educational support and investment workshops designed for the plan participants. The nature of the topics to be covered will be determined by Horowitz & Company and the Client under the guidelines established in ERISA.

Other Services
Other pension consulting services may be negotiated upon request. All such services will be outlined in an advisory agreement specifying the services to be provided and the fees that will be charged for those services.

Wrap Fee Programs
We do not sponsor, manage, or participate in any wrap fee programs.

Assets Under Management
As of March 25, 2025, we managed approximately $145,410,356 in Client assets on a discretionary basis, and no Client assets on a non-discretionary basis.

Item 5 - Fees and Compensation

Financial Planning and Consulting Fees
Fees are negotiable depending on the scope of the services requested, the Client's individual needs, the complexity of the Client's financial circumstances, and the estimated time needed to complete the requested services. Horowitz & Company generally charges a fixed fee ranging from $500 for simple, limited scope engagements and up to $10,000 for complex financial planning services or an hourly fee ranging from $250 for simple, limited scope engagements and up to $400 per hour for complex consulting services. Prior to engaging

Horowitz & Company to provide financial planning or consulting services, the Client will be required to enter into a written agreement with us. The agreement will set forth the terms and conditions of the engagement and describe the scope of the services to be provided and the portion of the fee that is due from the Client. Generally, Horowitz & Company requires a prepayment of 50% of the estimated fee, with the remaining balance due upon completion of the agreed-upon services. Horowitz & Company does not permit or require the prepayment of over $500, six or more months in advance. Hourly fees charged for consulting services are payable as invoiced. *In limited circumstances*, the required time could potentially exceed the estimated time frame. In all cases, written approval by the Client is required for any fee changes.

The Client may terminate the agreement within five days of entering into the agreement without fee or penalty. After the five-day period, either party may terminate the agreement by written notice to the other. In the event the services are terminated prior to completion of the financial planning services, any balance due for work completed (if any) will be due upon termination. Fees are payable directly to Horowitz & Company by check as invoiced. In the event there are any prepaid, unearned fees, the fee will be prorated based on the amount of work completed, and any unearned fees will be refunded to the Client promptly by check.

Portfolio Management Fees

Portfolio management fees are negotiable depending on factors such as the amount of assets under management, specifically selected strategies, range of investments, the complexity of the Client's financial circumstances, and the scope of services to be rendered, among others. Generally, Horowitz & Company charges a maximum annual rate not to exceed 2.0% of the market value of the assets being managed. All terms, agreed-upon fees, and fee payment arrangements will be set forth clearly in the advisory agreement executed between the Client and Horowitz & Company. Our annual fee is exclusive of and in addition to brokerage commissions, transaction fees, and other related costs and expenses that will be incurred by the Client.

Depending on the Client's needs and circumstances, Horowitz & Company may recommend one or more account custodians, such as Charles Schwab & Co., Inc. ("Schwab") and/or Interactive Brokers, LLC ("Interactive Brokers"). All recommended firms are independent and unaffiliated SEC-registered broker-dealers and members of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). These firms offer services that include custody of securities, trade execution, clearance, and settlement of transactions. Depending on the account custodian selected by the Client, fees are typically billed monthly or quarterly in advance at the beginning of each calendar month or quarter (depending on the billing cycle established by Horowitz & Company with the account custodian and as agreed upon with the Client) based upon the account value on the last business day of the previous applicable billing cycle. In some arrangements, such as those with Interactive Brokers, the fees may be prorated and charged daily, calculated as the net liquidation value multiplied by the fee and divided by the number of trading days in a calendar year. This is an automatic feature of the account with billing services provided by Interactive Brokers, in which Interactive Brokers, rather than Horowitz & Company, calculates and debits the advisory fees to be paid to Horowitz & Company. Otherwise, fees may be charged monthly in arrears based on the account value on the last business day of the month. In addition, Non-Standard Assets (annuities and other assets as determined) may be managed at an agreed-upon annual fee based on a percentage of the assets.

Typically, Clients opt to have the fee directly debited from their account by the qualified custodian holding investment account(s). We will only receive payment from the custodian if the Client supplies written authorization permitting the fees to be paid directly from the account. Horowitz & Company will not have access to Client funds for payment of fees without written consent by the Client. Either Horowitz & Company or the account custodian will calculate the fee based on the fee schedule provided in the contract between Horowitz &

Company and the Client. The custodian, as paying agent for the Client, will deduct the advisory fee and submit payment to Horowitz & Company. Where Horowitz & Company calculates the fee and the Client agrees to have fees deducted from the account, Horowitz & Company will send the custodian an invoice indicating the amount to be withdrawn from the Clients account and it will also send the Client an invoice itemizing the fee, which may include the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee. In limited circumstances and at its discretion, Horowitz & Company may agree to invoice the Client directly for management fees, which are payable by check as invoiced.

Clients will be notified of all transactions by trade confirmations from their custodian, and the custodian agrees to provide an account statement, at least quarterly, directly to the Client, showing all disbursements from the account. Horowitz & Company is provided with duplicate copies of the account statements. Clients should always compare invoices received from us to the reports and statements received from the custodian and review their custodial account confirmations and statements to verify the trading activity and the accuracy of withdrawals that occur in their account(s), as the custodian will not verify fees calculated by Horowitz & Company.

For the initial period of portfolio management services, the first period's fees will be calculated on a pro rata basis. The Client may terminate the agreement within five days of entering into the agreement without fee or penalty. After the five-day period, either party may terminate the agreement upon a 30 days' written notice to the other party. Any pre-paid, unearned fees will be prorated based on the number of days in the billing period up to and including the termination date. Any prepaid, unearned fees will be promptly refunded to the Client by check or by a credit to the account held by the qualified custodian, where possible.

Other Adviser Fees

Typically, the fees charged by sub-advisers are not negotiable and will be separate and distinct from our fees. We do not share in the fee charged by sub-advisers. Fees greater than 2.0% are considered to exceed industry standards; therefore, in no case will the total combined annual advisory fee paid to us and paid to a sub-adviser exceed 2.0% of assets under management. Fees will be prorated for any partial billing period. Generally, the custodian holding the client's account will deduct our fees, the sub-adviser's fees, and any other custodial fees directly from the client's designated account, provided the client has granted written authorization for the direct deduction. Generally, sub-advisory fees are due monthly or quarterly, in advance or arrears, depending on the sub-adviser selected. Upon termination of the selected sub-adviser, any prepaid, unearned fees will be prorated and refunded to the client promptly. Any fees accrued but not yet assessed to the account will be assessed through the termination date and billed accordingly. Refunds are not applicable for fees payable in arrears.

Asset Withdrawals and Additions

The Client may make additions to and withdrawals from the account at any time. Clients may withdraw account assets on notice to the account custodian, subject to the usual and customary securities settlement procedures. However, Horowitz & Company designs its portfolios as long-term investments, and asset withdrawals may impair the achievement of a Client's investment objectives. Clients are advised that when/if withdrawing funds and/or closing the account, there may be a delay in receiving full values as dividends and/or distributions may be pending. Additions may be in cash or securities, provided that the account custodian reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client's account. Horowitz & Company may consult with the Client about the options and ramifications of transferring securities. However, Clients are advised that when securities are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (i.e., contingent deferred sales charge), and/or tax ramifications.

Billing on Cash Positions: The firm treats cash and cash equivalents as an asset class. Accordingly, unless otherwise agreed in writing, all cash and cash equivalent positions (e.g., money market funds, etc.) are included as part of assets under management for purposes of calculating the firm's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there is no guarantee that such anticipated market conditions/events will occur), the firm may maintain cash and/or cash equivalent positions for defensive, liquidity, or other purposes. While assets are maintained in cash or cash equivalents, such amounts could miss market advances and, depending upon current yields, at any point in time, the firm's advisory fee could exceed the interest paid by the Client's cash or cash equivalent positions.

Periods of Portfolio Inactivity: The firm has a fiduciary duty to provide services consistent with the Client's best interest. As part of its investment advisory services, the firm will review Client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including but not limited to investment performance, fund manager tenure, style drift, account additions/withdrawals, the Client's financial circumstances, and changes in the Client's investment objectives. Based upon these and other factors, there may be extended periods of time when the firm determines that changes to a Client's portfolio are neither necessary nor prudent. Notwithstanding, unless otherwise agreed in writing, the firm's annual investment advisory fee will continue to apply during these periods, and there can be no assurance that investment decisions made by the firm will be profitable or equal any specific performance level(s).

Pension Consulting Fees
Fees are negotiable based on the facts and circumstances of the plan's needs, as well as the complexity of the requested services. Generally, plan consulting fees are based on an agreed-upon fixed fee or an annual percentage of the plan assets, ranging between 0.25% and 1.00%. Plan sponsors are invoiced in advance at the beginning of each calendar month or quarter. Fees and payment arrangements are negotiable on a case-by-case basis and will be set forth in the advisory agreement between the plan sponsor and Horowitz & Company.

The Client may terminate the agreement for services within five (5) business days of signing the agreement without fee or penalty. After the five-day period, either party may terminate the agreement at any time by providing written notice to the other party. Any pre-paid, unearned fees will be prorated based on the number of days in the billing period up to and including the termination date. Any prepaid, unearned fees will be promptly refunded by check to the Client or the plan through the plan administrator, or they will be credited to the account held by the qualified custodian, where possible.

Additional Fees and Expenses
As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the internal fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include an advisory fee and other fund expenses. You may also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer/account custodian through which your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer/account custodian. Where suitable, we will recommend no-load mutual funds. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the *Brokerage Practices* section in Item 12 of this Brochure.

Compensation for the Sale of Insurance Products

While Horowitz & Company is not an insurance company, broker, or agency, certain persons providing investment advice on behalf of our firm, including Mr. Horowitz, are licensed as independent insurance agents. It is estimated that insurance commissions will be a marginal part (approximately 5 percent or less) of the individual's professional time or income, as the primary focus will be the investment advisory business rather than their insurance business. Nonetheless, these persons are eligible to receive commission-based compensation for selling insurance products, including insurance products they sell to advisory Clients. Insurance commissions earned by these persons are separate and in addition to our advisory services and fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than recommendations made solely based on your needs. We address this conflict of interest by recommending insurance products that are in the Client's best interest and in accordance with any investment advice provided to the Client. Any insurance commissions will be charged separately through the insurance company or agency and remitted to the individual in their capacity as an insurance agent. Horowitz & Company will not be paid directly for any insurance commissions. Clients to whom the firm offers advisory services are also advised that they always have the right to decide whether to act on an insurance recommendation made by persons associated with our firm; and, if they decide to act on such recommendation, they always have the right to obtain insurance products or services from any insurance provider they choose.

Any material conflicts of interest between you and our firm or our employees are disclosed in this Brochure. If at any time, additional material conflicts of interest develop, we will provide you with written notification of the material conflicts of interest or an updated Brochure.

Non-Investment Advisory Services and Fees

Other services offered through Horowitz & Company include tax preparation services for advisory and non-advisory Clients. Horowitz & Company is not an accounting firm, and individuals associated with the firm are not Certified Public Accountants (CPAs) or Enrolled Agents (EAs). Fees for tax preparation services are separate and distinct from our advisory fees. Tax preparation work is billed at a fixed fee and is based on time and complexity. Although this represents a small fraction of our services and workload, it is offered primarily as a convenience to our Clients. The maximum tax preparation fee is $5,000. Fees for tax preparation are due upon completion. Clients are not obligated to utilize the tax preparation services offered through Horowitz & Company. Clients always have the right to obtain tax preparation services from any provider they choose.

Horowitz & Company has agreed to provide website design and content services for a Client's company, which may include services such as hosting, design management, content management, and development, for a monthly negotiable fee. We maintain the site for their employees as well as current and prospective members of that company. The services include providing only impersonal financial planning articles and tools related to general financial planning topics, such as Educational Planning, Retirement Planning, Eldercare, Economic Updates, Insurance Planning, Financial Calculators, etc. Horowitz & Company manages the content and design as well as the site maintenance. It is important to note that Horowitz & Company, Inc. does not provide investment advice within the content. In addition, the site is not readily accessible to the public, as it requires a specific key to access it. That access key will be made available by the company (at their discretion) to employees, members, prospective members, and others. Horowitz & Company will not have control of the access. The site SEO criteria also discourage search engine listing, and it includes "do not follow" rules for search engines that may crawl the site.

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

Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a Client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. We do not accept performance-based fees or participate in side-by-side management. Our fees are calculated as described in the *Advisory Business* section above at Item 4 and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 - Types of Clients

We offer investment advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations, pension and profit sharing plans, and corporations, or other business entities.

Horowitz & Company deploys several different strategies, based upon the Client's specific needs, circumstances, and amount of investable assets, any of which may change over time. Generally, we require a minimum amount of investable assets to establish and maintain an asset management relationship. Depending on the strategy selected by the Client, the minimum ranges from $25,000 to $500,000, as set forth in the advisory agreement. At our sole discretion, we may waive minimum requirements. For example, we may waive the minimum if you appear to have significant potential for increasing your assets under our management. Unless instructed otherwise, we will combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts of members of your household to meet the relevant minimums.

Certain model portfolios and accounts managed by sub-advisers may be subject to different minimum investment requirements; therefore, participation in some models or platforms may be limited to clients who meet those minimum requirements. We will only recommend sub-advisers and/or investments for which the client meets any minimum requirements.

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

For financial planning services, Horowitz & Company analyzes the Client's financial goals and objectives, income and spending, savings and investments, risks and insurance needs, asset allocation, and tax implications. This analysis seeks to ensure that the Client's needs are addressed while making progress toward their financial goals and objectives.

For portfolio management services, Horowitz & Company uses several analysis techniques to determine investments in a given portfolio that may include quantitative, fundamental, technical, and other analyses.

Portfolios can be structured using analytic and philosophical measures. A combination of strategic and tactical asset allocation is the basic strategy in the formation of our recommendations. Historic and projected returns may be utilized to determine the "Portfolio Model" as defined by Modern Portfolio Theory, Mean-Variance Optimization, Technical, Fundamental, and Quantitative theories, and other potential investment disciplines. In addition, individual securities will be researched through quantitative, fundamental, and technical analysis.

Quantitative analysis is used to analyze investment opportunities through a mathematical screening process. We use screening criteria to perform quantitative analysis related to key financial ratios and data such as earnings growth, ROE, price-earnings ratio (P/E), or revenue growth in our investment decision-making process. Quantitative analysis ranges from the examination of simple statistical data (e.g., revenue) to complex calculations. Securities are identified for their investment potential and opportunity through the analysis.

In its **fundamental** analysis, Horowitz & Company seeks to determine the intrinsic value of equities based on a thorough analysis of the fundamental business factors of the given stock(s) at issue. This may include analysis of financial statements, earnings, dividends, management structure, competitive advantages, product offerings, competitors, and markets. In essence, this method of analysis evaluates the overall condition of the company (or companies in a mutual fund or ETF) to determine whether it is a sound investment.

The analysis applied by Horowitz & Company may also include the use of corporate releases, as well as brokerage firm research reports, and information obtained from financial periodicals and other printed media. The analysis methods of Horowitz & Company are based upon the research of each individual company, which may lead to consultation with competitors and informed investors within the industry in question.

In addition to standard reference sources for information regarding economic conditions and corporate data, Horowitz & Company also subscribes to several U.S and international computer pricing data/analysis and portfolio research services.

In its **technical** analysis, Horowitz & Company seeks to determine the future direction of prices through the study of past market data, primarily price and volume. This is done by charting the movement of investments to identify trends and patterns used in the selection of securities to purchase and price points to buy and sell. Horowitz & Company uses a number of stock screeners and other software to chart and analyze the movement of various investments.

Despite the fundamental, technical, and quantitative analysis performed by Horowitz & Company, any investment in securities carries market risk, and investors may lose their principal investment. However, Horowitz & Company reminds Clients that investing in securities involves the risk of loss that they must be prepared to bear.

For Portfolio Management Services, the investment strategies used will vary depending on the Client's financial goals and risk tolerance.

Aggressive strategies may include momentum (short-term) trading and short positions. These may have margin trading associated with this strategy. Horowitz & Company's investment strategy may include long-term and short-term purchases, trading, and options, as well as other strategies.

Active strategies may entail additional risk due to a greater frequency of transactions, which may involve additional brokerage fees, transaction costs, and taxes. Also, strategies that use options may entail additional risk as losses may exceed those seen in the underlying stock.

IRA Rollover Considerations
As part of our investment advisory services to you, if we deem it to be in your best interest, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA"). If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset-based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest as your fees may be higher than those available through the plan's current or other service providers.

Recommendation of Particular Types of Securities
As disclosed under the *Advisory Business* section above in Item 4 of this Brochure, we recommend all types of securities, and we do not necessarily recommend one particular type of security over another, since each Client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it, and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it. Below are some examples of risks associated with certain types of investments.

Mutual funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. The returns on mutual funds are often reduced by the costs to manage the funds. In addition, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, other types of mutual funds do charge such fees, which can also reduce returns.

Short Sales are securities transactions in which an investor sells securities he or she borrowed in anticipation of a price decline. The investor is then required to return an equal number of shares at some point in the future. A short seller will profit if the stock goes down in price, but if the price of the shares increases, the potential losses are unlimited.

Margin transactions are securities transactions in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan. If the value of the shares drops sufficiently, the investor will be required to either deposit more cash into the account or sell a portion of the stock in order to maintain the margin requirements of the account. This is known as a "margin call." An investor's overall risk includes the amount of money invested plus the amount that was loaned to them. The expense of maintaining a debit balance in a margin account reduces returns.

An option is a right, but not an obligation, to buy or sell a particular security at a specified price before the expiration date of the option. When an investor sells an option, he or she must deliver to the buyer a specified number of shares if the buyer exercises the option. The seller pays the buyer a premium (the market price of the option at a particular time) in exchange for writing the option. Options are complex investments and can be very risky, especially if the investor does not own the underlying stock. In certain situations, an investor's risk can be unlimited.

In rare instances, Horowitz & Company may recommend investments in initial public offerings, provided the Client acknowledges that investments in initial public offerings may require that the IPO be held in their account for at least thirty (30) days after such offering closes.

The securities mentioned above reflect a broad range of investment risk, including some securities that entail high degrees of risk, such as stock options and initial public offerings that may not be suitable for the average investor.

When appropriate to the needs of the Client, Horowitz & Company may recommend the use of trading (securities sold within 30 days), short sales, margin transactions, options writing for covered calls, and other hedging strategies. Because these investment strategies involve certain additional degrees of risk, they will only be recommended when consistent with the Client's stated tolerance for risk.

Investment advice may also be provided on investments such as, but not limited to, limited partnerships and private placement partnerships, Real Estate Investment Trusts (REITs), interests in oil and gas, equipment leasing, cable television, and fast-food franchising. These types of investments will only be recommended when suitable to the Client's goals and risk tolerance.

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

General Investment Risk: All investments come with the risk of losing money. Investing involves substantial risks, including the complete possible loss of principal plus other losses, and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk, and you should familiarize yourself with the risks involved in the particular market instruments in which you intend to invest.

Loss of Value: There can be no assurance that a specific investment will achieve its investment objectives, and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise, and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulations, tax laws, withholding taxes, international political and economic developments, and governmental economic or monetary policies.

Interest Rate Risk: Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value when interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer-term debt securities are usually more sensitive to interest rate changes.

Credit Risk: Investments in bonds and other fixed-income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower-quality debt securities are more susceptible to these problems, and their value may be more volatile.

Foreign Exchange Risk: Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned, and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation, and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

Risks Associated with Investing in Equities: Investments in equities generally refer to buying shares of stocks by an individual or firm in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value, and the investment may incur a loss. Individual equities become more volatile when dividends are reduced or eliminated.

Risks Associated with Investing in Exchange Traded Funds (ETF)/Exchange Traded Notes (ETN): Investing in stocks & ETFs/ETNs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency. A non-indexed ETF can trade at a price above (premium) or below (discount) its net asset value, and a non-indexed ETF at a premium may ultimately be sold at a discount.

Risks Associated with Investing in Options: Transactions in options carry a high degree of risk. A relatively small market movement will have a proportionately larger impact, which may work for or against the investor. The placing of certain orders, which are intended to limit losses to certain amounts, may not be effective because market conditions may make it impossible to execute such orders. Selling ("writing" or "granting") an option generally entails considerably greater risk than purchasing options. Although the premium received by the seller is fixed, the seller may sustain a loss well in excess of that amount. The seller will also be exposed to the risk of the purchaser exercising the option, and the seller will be obliged either to settle the option in cash or to acquire or deliver the underlying investment. If the option is "covered" by the seller holding a corresponding position in the underlying investment or a future on another option, the risk may be reduced.

Risks Associated with Investing in Illiquid Securities: Illiquid securities involve the risk that investments may not be readily sold at the desired time or price. Securities that are illiquid, that are not publicly traded, and/or for which no market is currently available may be difficult to purchase or sell, which may impact the price or timing of a transaction. An inability to sell securities can adversely affect an account's value or prevent an account from taking advantage of other investment opportunities. Lack of liquidity may cause the value of investments to decline, and illiquid investments may also be difficult to value. A client may not be able to liquidate an investment in the event of an emergency or for any other reason.

Certain investment strategies used by our firm may invest in illiquid asset vehicles, such as private equity and real estate. Investment in an illiquid asset vehicle poses similar risks to direct investments in illiquid securities. In addition, investment in an illiquid asset vehicle will be subject to the terms and conditions of the illiquid asset vehicle's investment policy and governing documents that often include provisions that may involve investor lock-in periods, mandatory capital calls, redemption restrictions, infrequent valuation of assets, etc. In addition, investments in illiquid securities or vehicles may normally involve investment in non-marketable securities where there is limited transparency. If obligated to sell an illiquid security prior to an expected maturity date, particularly with an infrastructure investment, they may not be able to realize fair value. Investments in illiquid securities or vehicles may include restrictions on withdrawal rights, and shares may not be freely transferable.

Risks Associated with Investing in Inverse and Leveraged Funds: Leveraged mutual funds and ETFs generally seek to deliver multiples of the daily performance of the index or benchmark that they track. Inverse mutual funds and

ETFs generally seek to deliver the opposite of the daily performance of the index or benchmark that they track. Inverse funds are often marketed as a way for investors to profit from, or at least hedge their exposure to, downward-moving markets. Some Inverse funds are both inverse and leveraged, meaning that they seek a return that is a multiple of the inverse performance of the underlying index. To accomplish their objectives, leveraged and inverse funds use a range of investment strategies, including swaps, futures contracts, and other derivative instruments. Leveraged, inverse, and leveraged inverse funds are more volatile and riskier than traditional funds due to their exposure to leverage and derivatives, particularly total return swaps and futures. At times, we will recommend leveraged and/or inverse funds, which may amplify gains and losses.

Most leveraged funds are typically designed to achieve their desired exposure on a daily (in a few cases, monthly) basis and reset their leverage daily. A "single day" is measured from the time the leveraged fund calculates its net asset value ("NAV") to the time of the leveraged fund's next NAV calculation. The return of the leveraged fund for periods longer than a single day will be the result of each day's returns compounded over the period. Due to the effect of this mathematical compounding, their performance over longer periods of time can differ significantly from the performance (or inverse performance) of their underlying index or benchmark during the same period of time. For periods longer than a single day, the leveraged fund will lose money when the level of the Index is flat, and the leveraged fund may lose money even if the level of the Index rises. Longer holding periods, higher index volatility, and greater leverage all exacerbate the impact of compounding on an investor's returns. During periods of higher Index volatility, the volatility of the Index may affect the leveraged fund's return as much as or more than the return of the Index itself. Therefore, holding leveraged, inverse, and leveraged inverse funds for longer periods of time increases their risk due to the effects of compounding and the inherent difficulty in market timing. Leveraged funds are riskier than similarly benchmarked funds that do not use leverage. Non-traditional funds are highly volatile and not suitable for all investors. They provide the potential for significant losses.

Alternatives Risk: Non-traded REITs, business development companies, limited partnerships, and direct alternatives are subject to various risks such as liquidity and property devaluation based on adverse economic and real estate market conditions, and may not be suitable for all investors. A prospectus that discloses all risks, fees, and expenses may be obtained from your investment adviser representative. Read the prospectus carefully before investing. This is not a solicitation or offering, which can only be made in conjunction with a copy of the prospectus. Investors considering an investment strategy utilizing alternative investments should understand that alternative investments are generally considered speculative in nature, and such investments involve a high degree of risk, particularly if concentrating investments in one or a few alternative investments.

Cybersecurity Risks: Our firm and our service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes, and practices designed to protect networks, systems, computers, programs, and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. In general, cyberattacks are deliberate; however, unintentional events may have similar effects. Cyber-attacks may cause losses to Clients by interfering with the processing of transactions, affecting the ability to calculate net asset value, or impeding or sabotaging trading. Clients may also incur substantial costs as a result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose our firm to civil liability as well as regulatory inquiry and/or action. In addition, Clients could be exposed to additional losses as a result of unauthorized use of their personal information. While our firm has established a business continuity plan and systems designed to prevent cyberattacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cybersecurity risks are also present for issuers of securities, investment companies, and other investment advisers in which we invest, which could result in material adverse consequences for such entities and may cause a Client's investment in such entities to lose value.

Pandemic Risk: Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption. It is difficult to predict the long-term impact of such events because they are dependent on a variety of factors, including the global response of regulators and governments to address and mitigate the worldwide effects of such events. Workforce reductions, travel restrictions, governmental responses and policies, and macroeconomic factors could negatively impact investment returns.

Cryptocurrency Risk: Cryptocurrency (e.g., bitcoin and ether), often referred to as “virtual currency,” “digital currency,” or “digital assets,” is designed to act as a medium of exchange. Cryptocurrency is an emerging asset class. There are thousands of cryptocurrencies, the most well-known of which is Bitcoin. Certain of the firm’s Clients may have exposure to bitcoin or another cryptocurrency, directly or indirectly through an investment such as an ETF or other investment vehicles. Cryptocurrency operates without a central authority or banks and is not backed by any government. Cryptocurrencies may experience very high volatility, and related investment vehicles may be affected by such volatility. As a result of holding cryptocurrency, certain of the firm’s Clients may also trade at a significant premium or discount to NAV. Cryptocurrency is also not legal tender. Federal, state, or foreign governments may restrict the use and exchange of cryptocurrency, and regulation in the U.S. is still developing. The market price of many cryptocurrencies, including Bitcoin, has been subject to extreme fluctuations. If cryptocurrency markets continue to be subject to sharp fluctuations, investors may experience losses if the value of the Client’s investments declines. Similar to fiat currencies (i.e., a currency that is backed by a central bank or a national, supra-national, or quasi-national organization), cryptocurrencies are susceptible to theft, loss, and destruction. Cryptocurrency exchanges and other trading venues on which cryptocurrencies trade are relatively new and, in most cases, largely unregulated and may therefore be more exposed to fraud and failure than established, regulated exchanges for securities, derivatives, and other currencies. The SEC has issued a public report stating that U.S. federal securities laws require treating some digital assets as securities.

Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers, or malware. Due to relatively recent launches, most cryptocurrencies have a limited trading history, making it difficult for investors to evaluate investments. Generally, cryptocurrency transactions are irreversible, such that an improper transfer can only be undone by the receiver of the cryptocurrency agreeing to return the cryptocurrency to the original sender. Digital assets are highly dependent on their developers, and there is no guarantee that development will continue or that developers will not abandon a project with little or no notice. Third parties may assert intellectual property claims relating to the holding and transfer of digital assets, including cryptocurrencies, and their source code. Any threatened action that reduces confidence in a network’s long-term ability to hold and transfer cryptocurrency may affect investments in cryptocurrencies.

Many significant aspects of the U.S. federal income tax treatment of investments in cryptocurrency are uncertain, and investments in cryptocurrency may produce income that is not treated as qualifying income for purposes of the income test applicable to regulated investment companies. Certain cryptocurrency investments may be treated as a grantor trust for U.S. federal income tax purposes, and an investment by the firm’s Clients in such a vehicle will generally be treated as a direct investment in cryptocurrency for tax purposes and “flow-through” to the underlying investors.

Selection or Recommendation of Other Advisers
When we select or recommend a sub-adviser to manage all or a portion of your assets, we will work directly with the sub-adviser to allocate your assets among various classes of securities or managed model portfolios. As such, we will primarily rely on investment model portfolios and strategies developed by the sub-adviser(s) and their portfolio managers. If there is a significant deviation in characteristics or performance from the stated strategy and/or benchmark, we may change models or replace a sub-adviser. The primary risk associated with using sub-advisers is that while a particular sub-adviser may have demonstrated a certain level of success in the past, it may not be able to replicate that success in future markets. In addition, there is also a risk that a sub-adviser may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. To mitigate this risk, we seek sub-advisers with proven track records that have demonstrated a consistent level of performance and success over time. A sub-adviser's past performance is not a guarantee of future results, and certain market and economic risks exist that may adversely affect an account's performance which could result in capital losses in your account.

Item 9 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. We have no material history of legal or disciplinary events to report under this item. However, additional information about Horowitz & Company, Inc. is available on the SEC's website at www.adviserinfo.sec.gov. The CRD number for Horowitz & Company, Inc. is 106737. Additional information regarding Mr. Horowitz can be found in the attached Form ADV Part 2B Brochure Supplement and at www.adviserinfo.sec.gov. The CRD number for Mr. Horowitz is 1521621.

Item 10 - Other Financial Industry Activities or Affiliations

Neither Horowitz & Company nor Mr. Horowitz is registered as, or has pending applications to register as, a broker-dealer, Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor, or are currently an associated person of any of the foregoing types of entities.

Insurance and Other Outside Business Activities
See Item 5 of this Form ADV Part 2 Brochure for information regarding commission-based compensation for insurance services offered by Mr. Horowitz in his capacity as an independent insurance agent. Clients always have the right to obtain insurance products and services from any insurance provider they choose.

Additionally, Mr. Horowitz is a podcast host and author of books and other publications on the subject of investing, such as "The Disciplined Investor." Horowitz & Company and/or Mr. Horowitz may receive revenue from podcast advertising or the sale of such books and publications. Advisory Clients are not solicited to or required to purchase any such publications. The disciplines and strategies as described in his podcasts and publications and those employed in his practice may not be for every investor. Careful consideration should be taken as to the degree of risk one can tolerate.

TriggerCharts, LLC, which sells subscriptions to trading indicators, is co-owned by Mr. Horowitz and Kevin Hoffmann, Operations Manager of Horowitz & Company. As equal owners of TriggerCharts, LLC, Mr. Horowitz and Mr. Hoffmann each devote approximately 5 hours or less per week to this business and are compensated via flat subscription fees paid directly to TriggerCharts, LLC. Horowitz & Company, Inc. receives no compensation for subscriptions sold through TriggerCharts, LLC. Services of TriggerCharts, LLC are not offered to investment advisory Clients of Horowitz & Company.

It is anticipated that Mr. Horowitz spends approximately 15% or less of his professional time on these outside business activities, and it is anticipated that he earns approximately 10% or less of his income from these outside business activities.

Other Advisers
As disclosed throughout this brochure, we may select or recommend the services of sub-advisers and portfolio models developed by sub-advisers to manage all or a portion of a client's portfolio. Please see Items 4, 5, 7, and 8 of this brochure for additional information regarding this topic.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Description of Our Code of Ethics
Horowitz & Company has adopted a Code of Ethics (the "Code") to address investment advisory conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes Horowitz & Company's policies and procedures developed to protect the Client's interests in relation to the following topics:

- The duty at all times to place the interests of Clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the code of ethics.
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee's position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of Clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of Horowitz & Company's Code of Ethics is available to any Client or prospective Client upon request to Andrew Horowitz, President and Chief Compliance Officer, at (954) 349-0800 or info@horowitzco.com.

Personal Trading Practices
At times, Horowitz & Company or its associated persons, including Mr. Horowitz, may take positions in the same securities as Clients. This is considered a conflict of interest with Clients. We may also combine our orders to purchase securities with your orders to purchase securities ("block trading"). Please refer to the *Brokerage Practices* section below in Item 12 of this brochure for information on our block trading practices.

Otherwise, Horowitz & Company and associated persons will generally be "last in" and "last out" when trading occurs in close proximity to Client trades. However, at all times, we endeavor to uphold our fiduciary responsibilities to our Clients. Front running (trading shortly ahead of Clients) or otherwise disadvantaging Clients is prohibited. In the unlikely event that a conflict occurs because of materiality (e.g., a thinly traded stock), disclosures will be made to the Client(s) at the time of trading.

Although they would not necessarily be aware of the timing of trades being considered by the sub-adviser prior to the transaction being placed by the sub-adviser, this could be considered a conflict of interest with clients. Where Horowitz & Company or any persons associated with our firm are aware that the sub-adviser is considering specific transactions for client accounts on a specific trading day where there is a potential material conflict, they will make every effort to be “last in” and “last out” for the trading day when trading occurs in close proximity to client trades for which they are aware.

Item 12 - Brokerage Practices

We do not maintain physical custody of your assets; although we are deemed to have constructive custody of your assets if you give us authority to withdraw advisory fees from your account or in some cases, provide us with standing letters of authorization to transfer funds or securities to third parties (see the *Custody* section below at Item 15 of this Brochure). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer, bank, or trust company.

We have institutional custodial relationships with various qualified custodians, such as Charles Schwab & Co., Inc. (“Schwab”) and Interactive Brokers, LLC (“Interactive Brokers”). As such, depending on your needs, we may recommend one or more of these qualified custodians for your account. All recommended firms are independent and unaffiliated SEC-registered broker-dealers and members of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). These firms offer services that include custody of securities, trade execution, clearance, and settlement of transactions. We are not affiliated with recommended custodians. Our investment adviser representatives are not registered representatives of these firms, and they do not receive commissions or other compensation from recommending the brokerage or custodial services offered by these firms.

We believe that recommended broker-dealers/custodians provide quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by recommended broker-dealers/custodians, including the value of research provided, the company’s reputation, execution capabilities, commission rates, and responsiveness to our Clients and our firm. In recognition of the value of research services and additional brokerage products and services recommended broker-dealers/custodians provide, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

Schwab

Schwab Advisor Services™ is Schwab’s business serving independent investment advisory firms like ours. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and will buy and sell securities in your account(s) upon our instructions. While we recommend that you use Schwab as custodian, you will decide whether to do so, and you will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you.

Your Custody and Brokerage Costs

Schwab generally does not charge you separately for custody services, but it is compensated by charging commissions or other fees on trades that it executes or that settle into your Schwab account. In addition to commissions, Schwab charges a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer, but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account.

Research and Other Soft Dollar Benefits
Although not considered "soft dollar" credits used to purchase services or products, Horowitz & Company may receive some economic benefits from Schwab Advisor Services in the form of access to its institutional brokerage, trading, custody, reporting, and related services, many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our Clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we do not have to request them) and at no charge to us as long as we keep a total of at least $10 million of our Clients' assets in accounts at Schwab. If we have less than $10 million in Client assets at Schwab, Schwab may charge us quarterly service fees. Below is a detailed description of Schwab's support services.

Services that Benefit You: Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our Clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that May Not Directly Benefit You: Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our Clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our Clients' accounts, including accounts not maintained at Schwab.

In addition to investment research, Schwab also makes available software and other technology that:

- provide access to Client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple Client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our Clients' accounts; and
- assist with back-office functions, recordkeeping, and Client reporting.

Services that Generally Benefit Only Us: Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events;
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants, and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment for our personnel.

Additionally, we may receive certain hard dollar benefits from some recommended custodians to help us pay for certain start-up costs, software purchases, and compliance assistance services. Clients should be aware of this conflict and consider it in deciding whether to custody their assets with firms recommended by our firm. However, Horowitz & Company understands its duty for best execution and considers all factors in making recommendations to Clients. These research services may be useful in servicing all Horowitz & Company Clients, and may not be used in connection with any particular account that may have paid compensation to the firm providing such services. While Horowitz & Company may not always obtain the lowest commission rate, Horowitz & Company believes the rate is reasonable in relation to the value of the brokerage and research services provided.

Some of the products, services, and other benefits provided by Schwab may benefit us, and may not benefit our Client accounts. Our recommendation or requirement that a Client place assets in Schwab's custody may be based in part on benefits Schwab provides to us or our agreement to maintain certain Assets Under Management at Schwab, and not solely on the nature, cost, or quality of custody and execution services provided by Schwab.

Interactive Brokers

Interactive Brokers offers value-added services to independent investment advisors, such as Horowitz & Company. Their services include custody of Client accounts and securities, trade execution, clearance and settlement of transactions, and daily research and investment information. Interactive Brokers will hold your assets in a brokerage account and will buy and sell securities upon our request.

Research and Other Soft Dollar Benefits

Interactive Brokers provides Horowitz & Company with access to its software platform. This service is not contingent upon Horowitz & Company committing to Interactive Brokers any specific amount of business (assets in custody or trading commissions). For certain Clients' accounts, and under certain circumstances, it is conceivable that another broker-dealer/custodian may charge less for effecting the same transaction. This creates a conflict of interest as Horowitz & Company may route orders through Interactive Brokers even though another brokerage may charge less or provide a better execution price for effecting the same transaction. When such directed trades are made, a conflict of interest exists as Mr. Horowitz earns soft dollars for such transactions, which may create an incentive to recommend/direct Interactive Brokers over other broker-dealers/custodians.

Under this arrangement, from time to time, the software being used by Horowitz & Company will affect transactions, subject to the parameters predetermined and agreed upon with the Client, through Interactive Brokers and Horowitz & Company. A portion of the commission from those transactions will be allocated to Horowitz & Company's segregated "master account" maintained at Interactive Brokers. Horowitz & Company will then pay Interactive Brokers for its use of its software platform, research, or other services. However, Horowitz & Company is ultimately obligated to pay for such services with hard dollars if soft dollar transactions do not develop. Interactive Brokers services involved are used solely for the benefit of the Client(s) in whose account(s) the commissions are incurred. As trading facilitates the soft dollar process, it creates a conflict that Horowitz & Company may trade in excess in order to obtain soft dollars. Horowitz & Company's use of soft dollars for the Interactive Brokers software platform is intended to comply with the requirements of Section 28(e) of the Securities Exchange Act of 1934. Section 28(e) provides a "safe harbor" for investment managers who use commissions or transaction fees paid by their advised accounts to obtain investment research services that provide lawful and appropriate assistance to the manager in performing investment decision-making responsibilities. We believe our recommendation to use IB is in the Client's best interest based on the services IB provides and the fees IB charges.

Horowitz & Company understands its duty for best execution of Client trade orders and considers all factors in recommending Interactive Brokers to Clients. These research services may be useful in servicing all Horowitz & Company Clients, and may not be used in connection with any particular account or Client. While Horowitz & Company may not always obtain the lowest commission rate, we believe the rate is competitive and reasonable in relation to the value of the brokerage and research services provided.

It is important to note that some products, securities, and/or money managers may not transition from the Client's previous advisory firm to Horowitz & Company. Such positions would subsequently be required to be liquidated, resulting in potential transaction fees, as well as other changes to the account(s).

Brokerage for Client Referrals
From time to time, we may receive Client referrals from broker-dealers/custodians with which we have an institutional advisory arrangement for brokerage Clients in need of fee-based advisory services. However, we do not pay or receive referral compensation from any broker-dealer/custodian. Nonetheless, we may have an incentive to select or recommend a broker-dealer/custodian based on receiving Client referrals, rather than solely on Clients' best interest in receiving the most favorable execution. To address this conflict, we do not recommend that Clients utilize a particular broker-dealer/ custodian unless it is consistent with our duty to seek best execution of trades for Clients' accounts and selected strategies. We have not directed any Client transactions to a particular broker-dealer/custodian in return for Client referrals during our last fiscal year.

Directed Brokerage
We routinely recommend that you direct our firm to execute transactions through one of our recommended broker-dealers/custodians. As such, we may be unable to achieve the most favorable execution of your transactions, and you may pay higher brokerage commissions than you might otherwise pay through another broker-dealer/custodian that offers the same types of services. Not all advisers require their Clients to direct brokerage. You may utilize the broker-dealer/custodian of your choice and have no obligation to purchase or sell securities through such broker-dealer/custodian as we recommend.

In very limited circumstances, and at our sole discretion, some Clients may instruct our firm to use one or more particular broker-dealers/custodians for the transactions in their accounts. If you choose to direct our firm to use a particular broker-dealer/custodian, you should understand that this might prevent our firm from aggregating trades with other Client accounts or from effectively negotiating brokerage commissions on your behalf. This practice may also prevent our firm from obtaining a favorable net price and execution. Thus, when directing brokerage business, you should consider whether the commission expenses, execution, clearance, and settlement capabilities that you will obtain through your broker-dealer/custodian are adequately favorable in comparison to those that we would otherwise obtain for you.

Trade Aggregation/Block Trading
We combine multiple orders for shares of the same securities purchased for advisory accounts we manage on a discretionary basis whenever possible and where in the Clients' best interests (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. In rare instances, such as partial fills or limited shares of thinly traded or illiquid stocks, it may be necessary to place block trades for only small groups of Clients over a period of time. Subject to our discretion regarding factual and market conditions, typically when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs, or, in some cases, each Client pays the same

fixed fee per transaction. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

If you enter into non-discretionary arrangements with our firm, we will not be able to buy and sell the same quantities of securities for you, and you may pay higher commissions, fees, and/or transaction costs than Clients who enter into discretionary arrangements with our firm. We are not able to combine orders for non-discretionary accounts, as we may not be able to obtain prior Client consent in a timely manner in order for non-discretionary accounts to participate in time-sensitive block trades. Accordingly, non-discretionary accounts may pay different or higher costs than discretionary accounts pay for transactions in the same securities. We do not combine multiple orders for shares of the same mutual funds purchased for advisory accounts we manage because mutual funds do not trade in blocks.

Item 13 - Review of Accounts

Managed Account Reviews

While the underlying securities within Clients' managed accounts are continuously monitored for consistency of account holdings with Clients' stated investment needs and objectives, internal account reviews will be conducted at least quarterly by Andrew Horowitz, President and Chief Compliance Officer. We recommend a review meeting or call with Clients at least annually. More frequent reviews may be triggered by material changes in variables such as the Client's individual circumstances, the market, or the political or economic environment.

Clients are encouraged to notify us immediately of any changes in their personal or financial circumstances, investment goals, objectives, risk tolerance, or other concerns. Additional reviews may be offered in certain circumstances. Triggering factors that may stimulate additional reviews include, but are not limited to, changes in economic conditions, changes in the Client's financial situation or investment objectives, or upon Client request.

In addition to the monthly and/or quarterly statements and/or confirmations of transactions that Portfolio Management service Clients receive from their broker-dealer(s)/custodian(s), and where contracted to do so, Horowitz & Company will provide written or oral reports to Clients as agreed upon.

Financial Plan Reviews

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information that you provide to us. Horowitz & Company reviews the initial financial plan with the Client. Thereafter, we recommend that Clients engage us on an annual basis to update the financial plan. Clients may engage the firm for additional reviews and/or updates, subject to the then-current hourly or fixed fee to be negotiated with the Client based on the scope of the requested services and estimated time to complete the review. Financial Planning Clients are encouraged to meet with Horowitz & Company at least once per year to review their financial plan to ensure that their financial plan aligns with their current financial condition, goals, and objectives.

Item 14 - Client Referrals and Other Compensation

Compensation for Client Referrals

Non-employee (outside) consultants, individuals, or entities who refer a Client to Horowitz & Company may receive compensation from the firm. Such arrangements will comply with the requirements of the relevant jurisdictions, including the requirement that the compensation arrangement is disclosed to the prospective Client at the time of the referral. Referral compensation will only be paid in jurisdictions in which the relevant parties are registered or exempt from registration requirements. Under these arrangements, the Client does not pay higher fees than Horowitz & Company's customary advisory fees.

Other Compensation

Horowitz & Company has brokerage and clearing arrangements with various qualified custodians, such as Schwab and Interactive Brokers. As such, the firm may receive additional benefits from them in the form of electronic delivery of Client information, electronic trading platforms, institutional trading support, proprietary and/or third-party research, continuing education, practice management advice, and other services provided by custodians for the benefit of investment advisory Clients as described above in the *Brokerage Practices* section of this Brochure at Item 12. Other than the soft dollar benefits discussed immediately above and in Item 12, we do not receive any compensation from any third party for the advisory services we provide to our Clients.

Item 15 - Custody

We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. Pursuant to your written authorization, as paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees. The ability for us to calculate the fee and send an invoice to the custodian with the amount of the fee to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. Additionally, we are deemed to have custody in certain situations where we accept standing letters of authorization from Clients to transfer assets to third parties. In all cases, we maintain safeguards in accordance with regulatory requirements regarding the custody of Client assets.

Typically, Clients opt to have the fee directly debited from their account by the qualified custodian holding investment account(s). We will only receive payment from the custodian if the Client supplies written authorization permitting the fees to be paid directly from the account. Horowitz & Company will not have access to Client funds for payment of fees without written consent by the Client. Either Horowitz & Company or the account custodian will calculate the fee based on the fee schedule provided in the contract between Horowitz & Company and the Client. The custodian, as paying agent for the Client, will deduct the advisory fee and submit payment to Horowitz & Company. Where Horowitz & Company calculates the fee and the Client agrees to have fees deducted from the account, Horowitz & Company will send the custodian an invoice indicating the amount to be withdrawn from the Clients account and it will also send the Client an invoice itemizing the fee, which may include the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee. In limited circumstances and at its discretion, Horowitz & Company may agree to invoice the Client directly for management fees, which are payable by check as invoiced.

Clients will be notified of all transactions by trade confirmations from their custodian, and the custodian agrees to provide an account statement, at least quarterly, directly to the Client, showing all disbursements from the account. Horowitz & Company is provided with duplicate copies of the account statements.

For accounts held at Interactive Brokers, as the qualified custodian, with automated billing, Interactive Brokers deducts advisory fees through the authority granted by the Client in its Agreement with Interactive Brokers. Fees are prorated and deducted from the Client's account. For example, where fees are charged on a daily basis, Interactive Brokers calculates the daily pro-rated fees as net liquidation value (market value) multiplied by the annual fee (a percentage) and divided by the number of trading days in a calendar year. This is an automatic feature of the account with billing services provided by Interactive Brokers. Horowitz & Company does not calculate the fee for accounts held at Interactive Brokers that have authorized automated billing. Therefore, we are not exercising limited custody in this situation.

In any case, you will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review all account statements and reports you receive from your custodian for accuracy and compare them to the invoices you receive from us. Minor variations may occur because of reporting dates, accrual methods of interest and dividends, and other factors. The custodial statement is the official record of your account for tax purposes. If you have questions, find any discrepancies, or if you did not receive an expected invoice, statement, or report from us or your custodian, please notify us immediately.

Item 16 - Investment Discretion

Horowitz & Company offers management services on a discretionary basis, whereby Clients must grant discretionary authority in the advisory agreement. The discretionary authority extends to the types and amounts of securities to be bought and sold in Client accounts.

If you wish to limit our discretionary authority (for example, by setting a limit on the type of securities that can be purchased for your account), simply provide us with your restrictions or guidelines in writing. Please refer to the *Advisory Business* section at Item 4 above in this Brochure for more information on our discretionary management services.

In the very limited circumstances in which we agree to provide non-discretionary portfolio management services, we will obtain Client approval prior to executing any transactions in the Client's account(s).

Item 17 - Voting Client Securities

Horowitz & Company does not vote proxies. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitations to vote proxies.

Class Action Lawsuits

From time to time, securities held in the accounts of Clients may be the subject of class action lawsuits. Horowitz & Company has no obligation to determine if securities held by the Client are subject to a pending or resolved class action lawsuit. It also has no duty to evaluate a Client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore, the firm has no obligation or responsibility to initiate litigation to recover damages on behalf of Clients who may have been injured as a result of actions, misconduct, or negligence by the corporate management of issuers whose securities are held by Clients.

Where the firm receives written or electronic notice of a class action lawsuit, settlement, or verdict affecting securities owned by a Client, it will forward all notices, proof of claim forms, and other materials to the Client. Electronic mail is acceptable where appropriate, and the Client has authorized contact in this manner.

Item 18 - Financial Information

Horowitz & Company has not been the subject of any bankruptcy proceeding. Our firm does not have any financial conditions or impairments that would prevent us from meeting our contractual or fiduciary commitments to you.

We do not take physical custody of Client funds or securities, or serve as trustee or signatory for Client accounts; and, we do not require the prepayment of more than $500 in fees six or more months in advance. Therefore, we are not required to include a financial statement with this Brochure.

Andrew A. Horowitz
Personal CRD Number: 1521621
President/Chief Compliance Officer/Investment Adviser Representative

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July 7, 2025

Form ADV Part 2B Brochure Supplement

This Brochure Supplement provides information about Andrew A. Horowitz that supplements the Form ADV Part 2A Brochure for Horowitz & Company, Inc. (hereinafter "Horowitz & Company"). You should have received a copy of the Brochure. Please contact Andrew A. Horowitz, Chief Compliance Officer at (954) 349-0800 or info@horowitzco.com if you did not receive the Brochure or if you have any questions about the contents of the Brochure or this Brochure Supplement. Additional information about Andrew A. Horowitz is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Andrew A. Horowitz, CFP®
Mr. Horowitz, President of Horowitz & Company, has practiced financial planning in South Florida since the late 1980s. Mr. Horowitz achieved the CFP® designation awarded by the International Board of Standards and practices for Certified Financial Planners, Inc., in 1991.

Year of Birth: 1965
Formal Education After High School:

- *None*

Business Background for the Previous Five Years:

- *Horowitz & Company, Inc., President/ CCO/Investment Adviser Representative, 10/1991 – Present*
- *TriggerCharts, LLC, Partner/Owner, 06/2013 to Present*

Professional Designations:
CERTIFIED FINANCIAL PLANNER™ (CFP®)
The CERTIFIED FINANCIAL PLANNER™, CFP®, and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by the Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold the CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and Client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by the CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the S*tandards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mr. Horowitz. Mr. Horowitz has no material history of legal or disciplinary events to report under this item. However, additional information regarding Mr. Horowitz (CRD 1521621) and Horowitz & Company (106737) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 4 - Other Business Activities

Mr. Horowitz is licensed as an independent insurance agent and can effect transactions in various insurance products, including life, health, and annuities, for commission-based compensation. Clients to whom Horowitz & Company offers advisory services may also be Clients for whom Mr. Horowitz acts as an insurance agent. Clients are instructed that the fees paid to Horowitz & Company for advisory services are separate and distinct from the commissions earned for placing the Client in insurance products. Moreover, Clients are under no obligation to use Mr. Horowitz for insurance services and may use any insurance brokerage firm and/or agent they choose.

Additionally, Mr. Horowitz is a podcast host and author of books and other publications on the subject of investing, such as "The Disciplined Investor." Horowitz & Company and/or Mr. Horowitz may receive revenue from podcast advertising or the sale of such books and publications. Advisory Clients are not solicited to or required to purchase any such publications. The disciplines and strategies as described in his podcasts and publications, and those employed in his practice, may not be for every investor. Careful consideration should be taken as to the degree of risk one can tolerate.

TriggerCharts, LLC, which sells subscriptions to trading indicators, is co-owned by Mr. Horowitz and Kevin Hoffmann, Operations Manager of Horowitz & Company. As equal owners of TriggerCharts, LLC, Mr. Horowitz and Mr. Hoffmann each devote approximately 5 hours or less per week to this business and are compensated via flat subscription fees paid directly to TriggerCharts, LLC. Horowitz & Company, Inc. receives no compensation for subscriptions sold through TriggerCharts, LLC. Services of TriggerCharts, LLC are not offered to investment advisory Clients of Horowitz & Company.

It is anticipated that Mr. Horowitz spends approximately 15% or less of his professional time on these outside business activities, and it is anticipated that he earns approximately 10% or less of his income from these outside business activities.

Item 5 - Additional Compensation

Apart from the receipt of compensation for the activities disclosed under Item 4 above, Mr. Horowitz does not receive additional compensation or economic benefits from third-party sources in connection with his advisory activities.

Item 6 – Supervision

In his role as an investment adviser representative, Mr. Horowitz is responsible for monitoring Client portfolios for investment objectives and other supervisory reviews. As President and Chief Compliance Officer, Mr. Horowitz is responsible for the management of the firm, supervision of firm personnel, and the implementation of the firm's compliance program.

Horowitz & Company has implemented a Code of Ethics and an internal compliance program that guides each Associated Person in meeting their fiduciary obligations to Clients. Mr. Horowitz adheres to Horowitz & Company's Code of Ethics and compliance manual as mandated. Clients may contact Mr. Horowitz at (954) 349-0800 or info@horowitzco.com to obtain a copy of Horowitz & Company's Code of Ethics.

Additionally, Horowitz & Company is subject to regulatory oversight by various agencies. These agencies require registration by Horowitz & Company and applicable employees. As a registered entity, Horowitz & Company is subject to oversight and regular examinations by regulators, which may be announced or unannounced. Horowitz & Company is required to periodically update the information provided to these agencies and to provide various reports regarding the firm's business and its assets under management.