

MRM Financial Advisors, LLC

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Form ADV Part 2A – Firm Brochure

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This brochure provides information about the qualifications and business practices of MRM Financial Advisors, LLC (“MRM” or the “Firm”). If you have any questions about the contents of this brochure, please contact us at 214-969-0400.

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.

MRM Financial Advisors, LLC is a state-registered investment adviser. Registration does not imply a certain level of skill or training.

Additional information about MRM Financial Advisors, LLC is available on the SEC’s website at:

www.adviserinfo.sec.gov

Item 2 – Material Changes

This brochure has been updated to reflect changes to the Firm’s business activities and affiliations and to update certain disclosure language consistent with current regulatory guidance.

Material updates include:

- Updated disclosure regarding the Firm’s affiliated businesses, including affiliated accounting firms, an insurance agency, or a real estate investment management company.
- Expanded disclosure regarding third-party investment managers.
- Updated discretionary advisory fee billing practices.

Clients may request a copy of the Firm’s most current brochure at any time by contacting the Firm at 214-969-0400.

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Item 4 – Advisory Business

Firm Overview

MRM Financial Advisors, LLC (“MRM” or the “Firm”) is a registered investment adviser that provides investment management and financial planning services to individuals, families, and other clients. The Firm offers customized investment strategies designed to help clients pursue their long-term financial goals.

The Firm was established in 2017. MRM Financial Advisors, LLC is wholly owned by MRM Group Holdings LLC.

Investment Management Services

The Firm provides ongoing portfolio management services to clients. These services include evaluating a client's financial circumstances, investment objectives, risk tolerance, time horizon, and liquidity needs, and developing an investment strategy designed to meet those objectives.

As part of the portfolio management process, the Firm may:

- Construct diversified portfolios
- Allocate assets among various asset classes
- Select investment managers or investment vehicles
- Monitor portfolio performance
- Periodically rebalance portfolios

Client portfolios may include investments such as mutual funds, exchange-traded funds (ETFs), equities, fixed income securities, and other investment vehicles deemed appropriate based on the client's financial profile.

Investment Philosophy

The Firm generally employs a long-term investment approach emphasizing diversification, strategic asset allocation, and disciplined portfolio management. Investment recommendations are designed to align with each client's individual objectives and risk tolerance.

Use of Third-Party Investment Managers

In certain circumstances, the Firm may recommend that clients engage the services of third-party investment managers or sub-advisers to manage all or a portion of their investment portfolios.

These third-party managers are typically responsible for the day-to-day management of client assets pursuant to the client's investment objectives. The Firm conducts due diligence on third-party managers prior to recommending them and monitors their performance on an ongoing basis.

Clients who utilize third-party investment managers may pay fees both to the Firm and to the third-party manager. Additional information regarding these fees is provided in Item 5 of this brochure.

When recommending third-party investment managers, the Firm conducts due diligence prior to making recommendations and periodically reviews the performance and

organizational stability of such managers. However, the Firm does not control the day-to-day investment decisions of third-party managers and cannot guarantee their performance.

Financial Planning Services

In addition to investment management services, the Firm may provide financial planning and financial consulting services. Financial planning services are designed to assist clients in evaluating their overall financial situation and developing strategies to pursue their long-term financial goals.

Financial planning services may address a variety of topics depending on the needs of the client, including:

- retirement planning
- investment planning
- cash flow and budgeting
- insurance planning and risk management
- estate planning considerations
- education funding
- business succession planning
- tax-efficient investment strategies

Clients engaging the Firm for financial planning services will typically receive recommendations designed to help them achieve their financial objectives. Implementation of financial planning recommendations is at the discretion of the client.

Financial planning recommendations are not limited to any specific service or product offered by the Firm or its affiliates.

Tax Planning Coordination

As part of the Firm's financial planning and investment advisory services, the Firm may consider tax-related factors when developing investment strategies or financial planning recommendations. This may include evaluating the tax efficiency of investment strategies, asset location considerations, tax-loss harvesting opportunities, and the potential tax implications of portfolio transactions.

While the Firm incorporates tax considerations into its investment and financial advice, MRM Financial Advisors, LLC does not provide legal or tax advice through its investment advisory services.

Clients should consult with their tax professional regarding their specific tax situation and the implementation of any tax-related strategies.

Clients of the Firm may also engage affiliated accounting firms, including McCarthy, Rose & Mills, LLP or MRM Tax and Consulting LLC, for tax preparation or tax advisory services.

These services are separate from the Firm's investment advisory services, and clients are not obligated to use these affiliated accounting firms.

Private and Alternative Investments

From time to time, the Firm may recommend private or alternative investments when appropriate for certain clients. These investments may include private equity, private credit, private oil and gas investments, private real estate investments, or other private investment vehicles.

These investments are typically offered through private placements and may only be available to accredited or qualified investors.

Certain principals of the Firm have ownership interests in affiliated businesses that manage real estate investment opportunities. Because the Firm and its principals may benefit financially from these investments, a conflict of interest exists when recommending them. Additional information regarding these affiliations is provided in Item 10 of this brochure.

Clients are under no obligation to invest in any affiliated investment opportunities.

Tailored Advisory Services

The Firm provides advisory services that are customized to the individual needs of each client. Clients may impose reasonable restrictions on the management of their accounts.

Types of Clients

The Firm generally provides advisory services to:

- Individuals
- High net worth individuals
- Trusts and estates
- Retirement plans
- Businesses and other entities

Assets Under Management

As of December 31, 2025, MRM Financial Advisors, LLC manages approximately \$77,674,332 in client assets. All client assets are managed on a discretionary basis.

Item 5 – Fees and Compensation

Advisory Fees

The Firm provides investment management services for a fee based on a percentage of assets under management (“AUM”). The firm’s standard fee schedule for investment management services is as follows:

| Assets Under Management | Annual Fee |
|-----------------------------|------------|
| \$0 - \$1,999,999 | 1.00% |
| \$2,000,000 - \$4,999,999 | 0.85% |
| \$5,000,000 - \$9,999,999 | 0.70% |
| \$10,000,000 - \$24,999,999 | 0.55% |
| Over \$25,000,000 | 0.45% |

At Adviser’s discretion and in certain circumstances, fees and account minimums are negotiable and therefore, Adviser’s fees can vary from client to client. Except as described in Item 7 below, Adviser charges a minimum annual fee of \$10,000.

Advisory fees are billed monthly in arrears based on the average daily balance of the assets in the client’s account during the preceding month.

Clients authorize the qualified custodian to deduct advisory fees directly from their accounts. Clients will receive statements from their custodian reflecting the deduction of advisory fees. The Firm also provides an invoice detailing the advisory fee charged.

Financial Planning Fees

The Firm may provide financial planning, comprehensive wealth assessments, or consulting services, generally for a fixed fee. Financial planning fees are determined based on the scope and complexity of the services provided and may vary depending on the client’s circumstances.

Financial planning fees are typically due at the beginning of the engagement and fees may range depending on the nature and complexity of the planning services provided.

Financial planning services are generally completed within three months but may vary depending on the scope of the engagement.

Clients will be informed of the specific fee and payment terms prior to the commencement of any financial planning engagement.

Other Fees and Expenses

Clients may incur additional fees imposed by third parties including brokerage commissions, custodial fees, mutual fund expenses, ETF expenses, and other investment-related costs. These fees are separate from the Firm's advisory fee.

Third-Party Investment Managers

When third-party managers are utilized, clients may pay fees both to the Firm and to the third-party manager. Clients should review the disclosure documents of any third-party manager for a complete description of their fees and services or inquire to MRM to receive information about these fees.

Insurance Commissions

Certain representatives of the Firm are licensed insurance agents and may recommend insurance products to clients as part of the financial planning process.

In their separate capacity as insurance agents, these individuals may receive commissions or other compensation from insurance companies.

The Firm's advisory clients are not required to purchase insurance products through MRM Insurance Services, and clients are free to obtain insurance products through other insurance agencies or providers.

Private Investments

Private investments may involve additional fees charged by the investment sponsor or manager. These fees are separate from the Firm's advisory fees.

Certain principals of the Firm may have financial interests in affiliated entities involved in sponsoring or managing such investments. These relationships are disclosed in Item 10.

Termination of Advisory Services

Either the Firm or the client may terminate the advisory agreement at any time by providing written notice. Fees will be prorated through the date of termination.

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

MRM Financial Advisors, LLC does not charge performance-based fees.

Some investment advisers manage accounts with performance-based fees alongside asset-based accounts. This may create conflicts of interest referred to as side-by-side management.

MRM does not charge performance-based advisory fees and therefore does not have these conflicts.

However, certain principals of the Firm have ownership interests in affiliated businesses that manage private investment funds. These affiliations may create other conflicts of interest disclosed in Item 10.

Item 7 – Types of Clients

The Firm generally provides advisory services to:

- Individuals
- High net worth individuals
- Trusts and estates
- Retirement plans
- Businesses and other entities

Adviser has certain minimum thresholds that have been established to allow Adviser to provide the high level of personal service and attention which we believe our clients deserve. Adviser prefers a minimum account size of \$1,000,000 and typically requires a minimum annual fee of \$10,000 for investment advisory services. If a client maintains less than \$1,000,000 of assets under Adviser's management, and is subject to the \$10,000

annual minimum fee, they will pay a higher percentage annual fee than the 1.00% referenced in the above standard fee schedule.

Adviser, in its sole discretion, may reduce its annual minimum fee for those individuals whom it believes have an enhanced future earnings capacity or will have the future ability to invest additional sums of money. This category includes young professionals.

In addition to the specific reduction described in the previous paragraph, Adviser, in its sole discretion, may reduce its advisory fee, minimum account size or minimum annual fee. In doing so, it may consider any criteria, including but not limited to anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, and an account's composition.

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

Methods of Analysis

MRM Financial Advisors, LLC utilizes a variety of analytical methods in developing investment recommendations for clients. These methods may include fundamental analysis, asset allocation analysis, and evaluation of investment managers.

Fundamental analysis involves evaluating economic and financial factors that may affect the value of securities, including company financial statements, industry conditions, economic trends, and market conditions.

The Firm may also evaluate mutual funds, exchange-traded funds (ETFs), and other investment vehicles by reviewing factors such as historical performance, management experience, investment strategy, costs, and overall suitability for client portfolios.

In addition, the Firm performs due diligence on third-party investment managers that may be recommended to manage client assets. This due diligence may include reviewing the manager's investment philosophy, track record, risk management practices, and organizational stability.

Investment Strategies

The Firm generally employs a diversified, long-term investment approach designed to align with each client's individual investment objectives, time horizon, and risk tolerance.

Investment strategies may include asset allocation among equities, fixed income securities, mutual funds, exchange-traded funds, and other investment vehicles. The Firm may also recommend third-party investment managers with specialized expertise in certain asset classes or investment strategies.

From time to time, the Firm may recommend private or alternative investments, including private real estate investments, when appropriate for certain clients.

Investment Risks

Investing in securities involves risk of loss that clients should be prepared to bear. The value of investments may fluctuate due to a variety of factors including economic conditions, market volatility, changes in interest rates, and other factors beyond the Firm's control.

Clients should understand that past performance is not indicative of future results and that no investment strategy can guarantee a profit or prevent losses.

Additional risks associated with investing may include, but are not limited to:

Market Risk – The risk that the value of securities will decline due to general market conditions.

Interest Rate Risk – The risk that the value of fixed income securities may decline due to rising interest rates.

Manager Risk – The risk that a third-party investment manager may underperform their intended investment strategy.

Liquidity Risk – Certain investments, particularly private or alternative investments, may not be readily marketable and may involve longer holding periods.

Clients should carefully consider these risks when making investment decisions.

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 a client's evaluation of the Firm or the integrity of the Firm's management.

MRM Financial Advisors, LLC has no legal or disciplinary events to disclose that would be material to a client's evaluation of the Firm or the integrity of its management.

Item 10 – Other Financial Industry Activities and Affiliations

MRM Financial Advisors, LLC is wholly owned by MRM Group Holdings LLC, which also owns several affiliated businesses.

These affiliations may create potential conflicts of interest because the Firm or its principals may receive economic benefits when advisory clients use services provided by affiliated businesses.

Affiliated Accounting Firms

MRM Group Holdings LLC owns:

- McCarthy, Rose & Mills, LLP
- MRM Tax and Consulting LLC

These firms provide accounting and tax advisory services. Clients may be referred to these firms for tax services.

Clients are not obligated to use the Firm's affiliated accounting firms.

Affiliated Insurance Agency

MRM Financial Advisors, LLC wholly owns MRM Insurance Services, LLC.

When insurance products are purchased through this agency, the agency may receive commissions from insurance companies.

Clients are not required to purchase insurance through MRM Insurance Services.

Affiliated Real Estate Investment Manager

MRM Financial Advisors LLC also owns MRM Real Estate Fund Manager LLC, which manages private real estate investment funds.

The Firm may recommend these investments to clients when appropriate. Because the Firm's principals have a financial interest in these investments, a conflict of interest exists.

Clients are not obligated to invest in these funds.

Item 11 – Code of Ethics

MRM Financial Advisors, LLC has adopted a Code of Ethics designed to ensure that the Firm and its employees act in the best interests of clients and comply with applicable federal and state securities laws.

The Code of Ethics establishes standards of business conduct and addresses conflicts of interest that may arise from personal trading by employees of the Firm. The Code of Ethics requires employees to place the interests of clients ahead of their own interests and to avoid activities that could create a conflict of interest.

Employees of the Firm may buy or sell securities for their own accounts that are also recommended to clients. This may create a conflict of interest if employees trade in the same securities as clients.

The Firm has established procedures designed to mitigate these conflicts, including monitoring employee trading activity and requiring certain pre-clearance and reporting of personal securities transactions.

Affiliated Investment Opportunities

From time to time, the Firm may recommend investment opportunities sponsored or managed by affiliated entities, including private real estate investments managed by MRM Real Estate Fund Manager LLC.

Because the Firm's principals have a financial interest in these affiliated investments, a conflict of interest exists when recommending these opportunities to advisory clients.

The Firm addresses this conflict by providing full disclosure to clients and by recommending such investments only when the Firm believes they are appropriate based on the client's investment objectives and financial circumstances.

Item 12 – Brokerage Practices

MRM Financial Advisors, LLC generally recommends Charles Schwab & Co., Inc. ("Schwab") as the qualified custodian for client accounts. Schwab is a FINRA-registered broker-dealer and member of the Securities Investor Protection Corporation (SIPC).

Schwab provides custody of client assets and executes securities transactions for client accounts. Schwab also provides MRM with access to institutional trading and custody services that are typically not available to retail investors.

These services include trading, custody, research, access to mutual funds and exchange-traded funds, account reporting, and other administrative services that support the management of client accounts.

Schwab may also provide certain technology and support services to assist the Firm in managing and administering client accounts. These services may include access to trading platforms, rebalancing technology, portfolio management software, market data, research tools, and other operational support.

MRM Financial Advisors is independently owned and operated and is not affiliated with Schwab.

The Firm seeks to recommend custodians and broker-dealers that provide high-quality services at competitive costs for client accounts.

Item 13 – Review of Accounts

Client accounts are monitored and reviewed on an ongoing basis by the Firm's investment adviser representatives.

Account reviews may consider a variety of factors including market conditions, changes in a client's financial circumstances, changes in investment objectives, and portfolio performance relative to the client's investment strategy.

Portfolio adjustments may be made periodically to maintain the client's target asset allocation or to respond to changes in market conditions.

Clients receive account statements directly from their qualified custodian at least quarterly. The Firm also provides clients with additional performance or portfolio reports on a quarterly basis.

Clients are encouraged to carefully review all statements received from the qualified custodian and to compare them with any reports provided by the Firm.

Item 14 – Client Referrals and Other Compensation

MRM does not compensate any person for client referrals.

Item 15 – Custody

MRM Financial Advisors, LLC, does not maintain physical custody of client funds or securities.

Client assets are held with qualified custodians, such as Charles Schwab & Co., Inc., which maintain custody of client accounts and provide account statements directly to clients at least quarterly.

The Firm is deemed to have limited custody of client assets solely because it has the authority to deduct advisory fees directly from client accounts. Clients provide written authorization for the Firm to deduct fees through the execution of the Firm's investment advisory agreement.

Clients will receive account statements directly from their qualified custodian that reflect the deduction of advisory fees. The Firm also provides clients with an invoice or fee statement detailing the advisory fees deducted.

Clients are encouraged to carefully review the statements they receive from their qualified custodian and to compare those statements with any fee statements or reports provided by the Firm.

Item 16 – Investment Discretion

MRM Financial Advisors, LLC provides investment management services on a discretionary basis. When discretionary authority is granted, the Firm may determine the securities to be purchased or sold for the client's account and the amount of securities to be bought or sold without obtaining prior client approval for each transaction that fit within a client's investment strategy.

Discretionary authority is granted by the client through the execution of the Firm's investment advisory agreement.

Clients may impose reasonable restrictions on the management of their accounts, including restrictions on specific securities or types of investments.

Item 17 – Voting Client Securities

The Firm does not vote proxies for client securities.

Item 18 – Financial Information

The Firm may receive fees in advance for financial planning services. Financial planning engagements are generally completed within six months. The Firm does not require prepayment of advisory fees more than six months in advance and in excess of \$1,200.

The Firm is not aware of any financial condition that would impair its ability to meet its obligations to clients.

MRM Financial Advisors, LLC has never been the subject of a bankruptcy proceeding.

Clients receive a separate privacy notice describing the Firm's policies regarding the protection of client information.