

Form ADV Part 2A Brochure

Two West Financial Partners LLC

D/B/A Two West

4551 W 107th Street, 3rd Floor

Overland Park, KS 66207

www.twowestcompanies.com

913-825-1722

September 04, 2015

This Brochure provides information about the qualifications and business practices of Two West Financial Partners LLC, (TWFP). If you have any questions about the contents of this Brochure, please contact us at 913-825-1722. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

TWFP is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information from which you can determine whether to hire or retain an Adviser.

Additional information about TWFP is also available via the SEC's web site www.adviserinfo.sec.gov.

Item 2 – Material Changes

This Brochure dated September 04, 2015 is the initial Brochure for Two West Financial Partners LLC.

In the future, this Item will discuss only specific material changes that are made to the Brochure and will provide clients with a summary of such changes. We will also reference the date of our last annual update of our Brochure.

Pursuant to SEC Rules, we will deliver to you a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. All such information will be provided to you free of charge.

Currently, our Brochure may be requested by contacting us at (913) 825-1722.

Additional information about TWFP is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with TWFP who are registered as investment adviser representatives of TWFP.

Item 3 - Table of Contents

Item 1 – Cover Page	i
Item 2 – Material Changes	ii
Item 3 - Table of Contents.....	iii
Item 4 – Advisory Business	1
Item 5 – Fees and Compensation.....	2
Item 6 – Performance-Based Fees and Side-By-Side Management	2
Item 7 – Types of Clients	2
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	3
Item 9 – Disciplinary Information.....	3
Item 10 – Other Financial Industry Activities and Affiliations	3
Item 11 – Code of Ethics	4
Item 12 – Brokerage Practices.....	5
Item 13 – Review of Accounts.....	6
Item 14 – Client Referrals and Other Compensation	7
Item 15 – Custody.....	7
Item 16 – Investment Discretion	7
Item 17 – Voting Client Securities	8
Item 18 – Financial Information	8
Brochure Supplement(s)	

Item 4 – Advisory Business

Two West Financial Partners LLC (TWFP), which also operates under the name “Two West”, is registered as an investment adviser with the Securities and Exchange Commission. TWFP is based in and organized as a limited liability company under the laws of the State of Kansas. The firm has been in business since 2015 and currently has 4 employees.

TWFP’s principal office and place of business is located at 4551 W 107th Street, Third Floor, Overland Park, Kansas 66207. Regular business hours are from 8:30am to 5:00pm Monday through Friday. The firm can be contacted by phone at (913) 825-1722.

TWFP is owned by two Kansas City area holding companies, Ram Ventures LLC and MTC Holdings Corporation. Ram Ventures LLC also owns Two West Capital Advisors, LLC, an SEC registered investment advisory firm providing investment management and advisory services to institutional and wealth management clients. MTC Holdings Corporation also owns Financial Counselors, Inc., an SEC registered investment advisory firm providing investment management and advisory services to institutional and wealth management clients, and owns three trust companies, Benefit Trust Company, Midwest Trust Company, and Midwest Trust Company of Missouri. See Item 10 below for additional information regarding these affiliations.

Marko Ungashick, Vernon Cushenbery, Ryan Rink, Stuart Berkley, Bradley Bergman, and Stacey Perry currently serve as Managers of the TWFP. Mr. Cushenbery also serves as the firm’s Chief Compliance Officer.

TWFP provides discretionary management, advisory, and consulting services to institutional clients, with a concentration on company retirement plans. Services are provided via subadvisory agreements with its affiliates, Two West Capital Advisors, LLC and Financial Counselors, Inc. Services may include drafting and or monitoring of investment policy statements, research and or selection of investment options, performance monitoring, participant enrollment and education, market updates, discretionary management services, and ERISA compliance consulting.

TWFP and its affiliates serve over \$36B in assets in over 40 states. Services include retirement plan consulting, institutional and private client wealth management and planning, financial wellness programs, corporate and private trust services, estate management, and institutional and private client custodial services. TWFP’s and its

affiliated investment advisory partners, Two West Capital Advisors, LLC and Financial Counselors, Inc., manage over \$6.9B in assets collectively.

Item 5 – Fees and Compensation

Fees for institutional client services are based on plan size and services rendered. Fees generally range from 0.10% to 1.00% of assets based on level of service, and are negotiated on a case by case basis.

Fees are generally due quarterly in arrears and can sometimes be deducted directly from the plan, but clients may elect to instead pay fees by check or wire transfer.

Services may be terminated upon 30 days written notice by client, and fees for partial periods will be prorated. Any payments made in advance will be prorated and refunded to client.

All fees paid to TWFP are separate and unrelated to any fees or expenses assessed by mutual funds, exchange traded funds, third party investment managers, brokers or custodians. Sub-advisory fees paid to TWFP affiliated companies however are paid by TWFP.

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

Although its fees are often asset based, TWFP does not charge additional performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

TWFP provides portfolio management, advisory and consulting services to corporate pension, profit-sharing plans, business entities charitable organizations, and other institutional clients. The minimum account size for institutional client services is generally \$2,000,000, although we may accept accounts not meeting the minimum on a case-by-case basis.

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

TWFP's primary investment strategy, which is similar to that of its affiliated partners, is to provide advice and manage portfolios in a manner consistent with the principles of Modern Portfolio Theory. TWFP generally recommends long term, strategic investing with a focus toward reducing risk and volatility through the use of globally diversified portfolios.

When formulating advice or managing assets, TWFP and its affiliated partners use various methods of analysis. These methods of analysis may include fundamental analysis, technical analysis, cyclical analysis, and charting, among others. TWFP and its affiliated partners use multiple sources of information for investment and market research. These sources include financial periodicals, third party research, regulatory filings, prospectuses, rating services, online research tools, etc.

Investing in securities involves risk of loss that clients should be prepared to bear. Such risks include market risk, interest rate risk, currency risk, and political risk, and loss of capital, among others. Additionally, certain trading strategies can affect investment performance through increased brokerage and other transactions. Each client's propensity for risk however is thoroughly evaluated, documented, and considered throughout the portfolio implementation process.

Although TWFP intends to manage risk through the careful selection of providers and investments, no investment strategy can assure a profit or avoid a loss.

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 the evaluation of the firm or the integrity of our management. TWFP is currently not subject to, nor has ever been subject to, any legal or disciplinary events of a material nature.

Item 10 – Other Financial Industry Activities and Affiliations

TWFP has ownership affiliations with various other financial service providers, two which are noted below.

Two West Capital Advisors, LLC

Two West Capital Advisors, LLC is an SEC registered investment advisory firm owned by RAM Ventures, LLC (a holding company which is also a co-owner of Two West Financial Partners, LLC), and Cretcher Heartland, an independent insurance brokerage firm specializing in property and casualty insurance, group employee benefits, and surety programs. Two West Capital Advisors, LLC provides investment advisory and management services to clients of TWFP pursuant to a sub-advisory agreement between the two firms, and provides various other services to TWFP pursuant to a services and facilities agreement between the two firms. Cretcher Heartland services may be made available to TWFP clients from time to time, but TWFP does not share in insurance revenues, and clients are under no obligation to purchase services from Cretcher Heartland.

Financial Counselors, Inc.

Financial Counselors, Inc. ("FCI") is an SEC registered investment advisory firm owned by FCI Holding Corporation (a co-owner of Two West Financial Partners). TWFP has various arrangements with FCI. FCI provides various services to TWFP pursuant to a services and facilities arrangement between the two firms. FCI may also function as a sub-adviser for some TWFP accounts, and in return, receives a portion of the investment management fee TWFP charges to its client.

Midwest Trust Company

Midwest Trust Company ("MTC") is owned by MTC Holding Corporation. MTC Holding Corporation also partially owns TWFP and indirectly owns FCI. MTC custodial services may be made available to TWFP clients from time to time, but TWFP does not share in revenues generated from custodial services, and clients are under no obligation to purchase such services from MTC.

Item 11 – Code of Ethics

Code of Ethics

TWFP has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. TWFP's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients, and details practices for reviewing the personal securities transactions of supervised

persons with access to client information. The Code also requires compliance with applicable securities laws, addresses insider trading, and details possible disciplinary measures for violations. TWFP will provide a complete copy of its Code of Ethics to any client upon request to the Chief Compliance Officer.

Trading Conflicts of Interest

Individuals associated with TWFP are permitted to buy or sell securities for their personal accounts identical to or different than those recommended to clients. However, no person employed by TWFP is allowed to favor his or her own interest over that of a client or make personal investment decisions based on the investment decisions of advisory clients.

In order to address potential conflicts of interest, TWFP requires that associated persons with access to advisory recommendations provide annual securities holdings reports and quarterly transaction reports to the firm's Chief Compliance Officer.

Item 12 – Brokerage Practices

TWFP generally does not recommend brokers for use by clients. Trading is generally done by custodians or platform providers. Other brokers may however be used by the client or the client's investment manager(s). TWFP does not monitor a client's trading arrangements unless contractually required to do so.

However, when TWFP does make recommendations concerning custodians or other providers, the firm considers many different factors including quality of service, services offered, execution quality, transaction costs, reputation of the firm, financial resources, and stability, among others. In determining the reasonableness of compensation, we consider the overall cost to you relative to the benefits you receive, both directly and indirectly, from the broker.

While we may evaluate or recommend various providers, you will ultimately decide who to retain and will open your account(s) directly with them.

With respect to brokerage conflicts of interest, TWFP does not receive research or other products and services in connection with client security transactions ("soft dollar benefits"). Clients may however pay for TWFP services using soft dollar credits they have received elsewhere. In other words, TWFP does not *receive* soft dollar benefits, but TWFP services may be purchased by a client *as* a soft dollar benefit.

Regarding directed brokerage arrangements, clients may elect to request that managers direct brokerage at their own discretion. TWFP will offer recommendations on such arrangements when requested.

Item 13 – Review of Accounts

Reviews of Accounts

Reviews for retirement plan sponsor advisory or general consulting services vary depending on the scope of the relationship, and are determined contractually.

With respect to investment management services provided to defined benefit plans and corporate clients, managed accounts are supervised by the principals of TWFP, or the respective third party manager or sub-advisor. In addition to ongoing supervision and oversight, accounts are generally reviewed more formally on a quarterly basis. The quarterly review generally includes assessing client goals and objectives, evaluating the employed strategy, monitoring the portfolio, and addressing the need to rebalance. TWFP will periodically, and at least annually, review client's investment policy and risk profile, and discuss the re-balancing of each client's accounts to the extent appropriate.

Additional account reviews may be triggered by a specific client request, by a change in client goals or objectives, by an imbalance in a portfolio asset allocation, or by market or economic conditions.

All ongoing clients are advised that it remains their responsibility to advise us of any changes in their investment objectives and or financial situation.

Regular Reports Provided to Clients

Retirement plan sponsor advisory and general consulting accounts will receive reports as contracted for at the inception of the relationship.

Institutional investment management clients are provided with account statements from their custodian on at least a quarterly basis which list account holdings and transactions for the period. Institutional investment management clients may also be provided with written performance reports on a quarterly basis that detail current market value, performance relative to market benchmarks, and overall portfolio allocation.

Item 14 – Client Referrals and Other Compensation

Two West may pay outside individuals or other professional entities to refer clients to us via a Solicitor's Agreement. Such agreements are structured to be in compliance with applicable securities laws. Each client is provided a disclosure statement prior to or at the time of entering into any advisory contract which describe the specific compensation arrangement. The advisory fee charged to clients will not increase as a result of the referral arrangement.

TWFP does not receive compensation from outside parties for business referrals, nor does TWFP receive direct outside economic benefits such as sales awards or prizes in connection with providing services to clients. TWFP may however from time to time receive nominal expense reimbursements (e.g. food/beverage) from service providers participating in TWFP sponsored events.

Item 15 – Custody

As noted in Item 12, TWFP does not hold institutional client assets but instead requires that all assets be held by a third party custodian. We may, however, have limited control in some instances to trade on your behalf, to deduct our advisory fees from your account with your authorization, or to request disbursements to you.

You will receive account statements directly from your custodian at least quarterly, which will be sent to the email or postal mailing address you provide. We urge you to carefully review these custodial statements when you receive them and compare them to reports you receive from us.

Item 16 – Investment Discretion

TWFP will accept both discretionary and non discretionary accounts. Any discretionary authority will be detailed in writing in the client agreement, and will be subject to the client's investment policy statement or as further limited by the client in writing. TWFP will not exercise any discretionary authority until it has been given authority to do so in writing.

Item 17 – Voting Client Securities

TWFP does not vote proxies on behalf of clients.

Item 18 – Financial Information

Registered investment advisers are required in some cases to provide certain financial information and or disclosures about financial condition. For example, if the firm requires prepayment of fees for six months in advance, has custody of client funds, or has a condition that is reasonably likely to impair its ability to meet its contractual commitments to its clients, it must provide financial information and make disclosures.

TWFP has no financial or operating conditions which trigger such additional reporting requirements.