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## **Firm Brochure**

(Part 2A of Form ADV)

This brochure provides information about the qualifications and business practices of TRUE MEASURE WEALTH MANAGEMENT. If you have any questions about the contents of this brochure, please contact us at: (402) 342-1400 or by email at: [info@truemeasure.com](mailto:info@truemeasure.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.

Additional information about TRUE MEASURE WEALTH MANAGEMENT is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

March 09, 2018

## Material Changes

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### Annual Update

There are no material changes in this brochure from the last annual updating amendment of True Measure Wealth Management, Inc. on March 27, 2017. Material changes relate to True Measure Wealth Management, Inc. policies, practices or conflicts of interests only.

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### Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: (402) 342-1400.

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## Advisory Business

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### **Firm Description**

TRUE MEASURE WEALTH MANAGEMENT, (formerly Meridian Management) was founded in 1998.

TRUE MEASURE WEALTH MANAGEMENT provides personalized confidential financial planning and investment management to individuals, trusts, estates, and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

TRUE MEASURE WEALTH MANAGEMENT is a fee-only financial planning and investment management firm. The firm is not affiliated with entities that sell financial products, securities or insurance products.

Investment advice is an integral part of financial planning. In addition, TRUE MEASURE WEALTH MANAGEMENT advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning.

Investment advice is provided, with the client making the final decision on investment selection. TRUE MEASURE WEALTH MANAGEMENT does not act as a custodian of client assets. The client always maintains asset control. Unless such authority is withheld by client, TRUE MEASURE WEALTH MANAGEMENT will supervise and direct the investments of the account subject to such limitations as client may impose by notice in writing. TRUE MEASURE WEALTH MANAGEMENT, as agent and attorney-in-fact with respect to the Account, may direct custodian to buy, sell, exchange, convert, and otherwise trade in any stocks, bonds, index futures and index options, and other securities (including money market, limited partnerships, mutual funds and listed stock options). TRUE MEASURE WEALTH MANAGEMENT will supervise and direct the investments of the account held at custodian on a discretionary basis, unless client specifically requests otherwise.

An overview of each client's initial situation is provided to the client, often in the form of a net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. Additional reviews may occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

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**Principal Owners**

Patrick Tucker is a 100% stockholder.

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**Types of Advisory Services**

TRUE MEASURE WEALTH MANAGEMENT provides asset management services and furnishes investment advice through consultations. Client establishes an investment advisory account(s) and appoints TRUE MEASURE WEALTH MANAGEMENT as the advisor to supervise and develop an asset allocation strategy using an appointed custodian to implement said strategy in accordance with the client's stated objectives, time horizon, risk tolerance and financial goals. At a minimum, client will receive a quarterly account statement from the custodian showing the account activity as well as the positions held in the account at quarter end. The client may also receive quarterly a written statement of investments of the account from the custodian showing portfolio values including performance results for the quarter.

TRUE MEASURE WEALTH MANAGEMENT uses the custodial services of SEI, TD Ameritrade Institutional and Betterment Institutional. SEI is a global provider of asset management, investment processing, and investment operations solutions for personal wealth management. SEI provides investment advisors with comprehensive wealth management services through outsourced investment management, back office, and administrative functions. TD Ameritrade Institutional is a provider of brokerage and custody services to investment advisors and their clients. Betterment Institutional is a provider of brokerage and custody services to investment advisors and their clients. Given that each client's situation is unique, a determination of which custodian to appoint is determined after an evaluation of all relevant facts and circumstances.

On more than an occasional basis, TRUE MEASURE WEALTH MANAGEMENT furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of December 2017, TRUE MEASURE WEALTH MANAGEMENT manages approximately \$ 158,009,413 assets for approximately 322 clients. Approximately \$ 158,009,413 is managed on a discretionary basis, and \$0 is managed on a non-discretionary basis.

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**Tailored Relationships**

The goals and objectives for each client are documented in our client relationship management system.

Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

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**Types of Agreements**

The following agreements define the typical client relationships.

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**Advisory Agreement****Financial Planning Services**

TRUE MEASURE WEALTH MANAGEMENT shall provide for client the services identified on the statement of work (see below), or in any statement of work subsequently entered into between the parties from time to time in accordance with the requirements set forth on such statement of work. Client shall pay TRUE MEASURE WEALTH MANAGEMENT fees for the services as set forth on the statement of work. TRUE MEASURE WEALTH MANAGEMENT has made and will make no guarantees or assurances as to the outcome of any engagement or to the extent of time and effort that will be involved in connection therewith, and specifically disclaims any warranties client may be entitled to as a consumer. It is understood and agreed that during the course of the engagement, client may elect not to implement specific recommendations outlined and/or recommended by TRUE MEASURE WEALTH MANAGEMENT. TRUE MEASURE WEALTH MANAGEMENT may appoint or otherwise designate suitable employees, agents and representatives to fulfill its obligations under this agreement and the employment, supervision and compensation of such individuals shall be at its sole and direct expense, responsibility and risk.

**Statement of Work**

Freedom of lifestyle requires clarity, focus and a unique perspective. At TRUE MEASURE WEALTH MANAGEMENT we partner with our clients to maintain lasting financial independence for more enjoyment today and confidence about tomorrow. Our approach allows clients to capture a wealth of opportunities through multi-faceted personal and business planning solutions.

***Discovery***

Maximize your personal and financial vision. During the first step of our process, we'll meet to discuss your lifestyle and legacy goals and will collect current financial documents to assess areas of opportunities, challenges, and strengths.



### ***Direction***

Once we've identified objectives and completed a financial review, we'll meet to provide direction for moving forward. During this discussion, we'll present an assessment report of your current planning, as well as the unique opportunities and challenges you face.

### ***Depth***

Because successful long-term planning requires a deep understanding of personal and financial objectives, we'll meet to conduct a financial personality review and lifetime vision discussion. We'll incorporate your core values, habits and risk tolerance into a comprehensive strategy.

### ***Delivery***

In step four, we are actively engaged in the implementation of your personal and financial vision. During the initial implementation phase, we will meet to discuss project deliverables and time lines and will provide training for the online component of our services.

### ***Dynamic***

Because life is dynamic, we'll coordinate periodic reviews to ensure that plans are growing with you as your needs and objectives evolve. By maintaining an active process, you'll achieve lasting financial independence and an enduring lifetime legacy.

## **Financial Planning Fees**

Client shall pay TRUE MEASURE WEALTH MANAGEMENT for its services, as set forth in the Advisory Agreement, an annual planning fee due upon receipt of invoice from Meridian. This fee entitles the client to participate in TRUE MEASURE WEALTH MANAGEMENT's financial planning process. Fees charged may be negotiated. Such fees may differ based upon a number of factors, including, but not limited to, the number and range of supplemental advisory and client-related services to be provided by TRUE MEASURE WEALTH MANAGEMENT to the client.

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## **Investment Management Agreement**

### **Investment Management Services**

Client hereby establishes an investment advisory account(s) and appoints TRUE MEASURE WEALTH MANAGEMENT as the advisor to supervise and develop an asset allocation strategy using an appointed custodian to implement said strategy in accordance with the client's stated objectives, time horizon, risk tolerance and financial goals. At a minimum, client will receive a quarterly account statement from the custodian showing the account activity as well as the positions held in the account at quarter end. The client may

also receive quarterly a written statement of investments of the account from the custodian showing portfolio values including performance results for the quarter.

### **Investment Management Fees and Expenses**

Client shall pay TRUE MEASURE WEALTH MANAGEMENT for its services, as set forth in the Investment Management Agreement, an annual portfolio management fee (see “Annual Fee Schedule” below) to be paid quarterly in arrears (on a calendar quarter basis) as a percent of the portfolio’s market value. The portfolio’s market value will be based on the closing value as of the final business day of each calendar quarter. Certain customary costs or charges are assessed to the client by the custodian. These costs are payable by the client and are not included, or a part of, the management fee.

Payment of fees will be made through a quarterly debit to client’s account. However, management fees may be billed directly to the client if so requested in writing by the client. Client authorizes custodian to deduct for TRUE MEASURE WEALTH MANAGEMENT any and all fees, when due, from the assets contained in the account.

Additional assets received into the account during any fee period may be charged a pro-rated management fee based on the number of days remaining in the fee period as against the total number of days in the fee period. In the event the Investment Management Agreement is terminated by either party prior to the end of the fee period, a pro-rata billing of the management fee will be made.

The management fee and/or fee schedule may be modified by TRUE MEASURE WEALTH MANAGEMENT upon notice to client. Fees charged may be negotiated. Such fees may differ based upon a number of factors, including, but not limited to, the type of account, the size of the account, and the number and range of supplemental advisory and client-related services to be provided by TRUE MEASURE WEALTH MANAGEMENT to the client. All accounts owned by the client and managed by TRUE MEASURE WEALTH MANAGEMENT will be aggregated to determine a discount, if any, to be applied to the management fee as outlined in the Fee Schedule below:

#### **TRUE MEASURE WEALTH MANAGEMENT.**

##### **Annual Fee Schedule**

<u>Account Asset Value</u>	<u>Annual Management Fee</u>
All Assets Managed	1.00%

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## **Hourly Planning Engagements**

TRUE MEASURE WEALTH MANAGEMENT provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$300.

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## **Asset Management**

Assets are invested primarily with third party money management firms, no-load or low-load mutual funds and exchange-traded funds, usually through custodians, discount brokers or fund companies. Custodians and fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. TRUE MEASURE WEALTH MANAGEMENT does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through TRUE MEASURE WEALTH MANAGEMENT.

## **Unified Managed Account Program**

We offer discretionary investment management services in a managed account program through an Overlay Manager (the “UMA Program”). This UMA Program may consist of using model portfolio advisers, model portfolios or other investment options such as mutual funds and/or exchange-traded funds (“ETFs”) to represent different investment strategies for managing your account. Each of these investment strategies is designed to meet a specific goal.

Prior to investing in the UMA Program, you will execute a discretionary investment management agreement with us setting forth the terms and conditions of our management of your investments within the UMA Program. Depending on the management services the client selects, the client will grant us limited discretionary authority to manage the client account through selection of an overlay manager (“Overlay Manager”), third party strategist (“Strategist”) and/or third party managers (“Managers”; collectively, “Third-Party Service Providers”). In addition, the client will authorize the custodian to follow our instructions as well as instructions given by Overlay Manager to effect transactions, deliver securities, deduct fees and take other actions with respect to the client account. The client will not have a direct contractual

relationship with the Overlay Manager or any other Third-Party Service Provider.

The timing of trades in the client account will primarily depend upon the model or changes in the model and, generally, will not take into consideration how long a client may have held the position indicated by the model.

We will retain the right to replace any Strategist or Manager on a discretionary basis. Depending on the service a client has selected, we will separately provide the client with the firm brochure (Part 2 of Form ADV) for the applicable Third-Party Service Provider(s) which includes information about their services, model portfolios, and investment strategies at or before the execution of our discretionary investment management agreement.

### **Tax Overlay Manager Services**

Tax overlay management services are available as an option for accounts utilizing the UMA Program through the Overlay Manager. If you elect tax overlay management services, the portion of your fee paid as the management fee on your account will increase. The Overlay Manager will develop a tax strategy for your account based on the information and instructions provided by us on your behalf. Tax overlay management services in an investment account offer benefits and limitations, as described below. The tax strategy developed for you by the Overlay Manager is provided solely in connection with your account and the Overlay Manager does not provide general tax planning services. If you do elect the tax overlay management services option, please consider the following:

- The Tax Overlay Manager will implement tax overlay management services based on the information and instructions provided for your account(s).
- The Tax Overlay Manager does not provide general tax advice, tax return preparation or tax planning services.
- ☐ The Tax Overlay Manager will seek to reduce the overall tax burden of the account while seeking to maintain the risk and return characteristics of the model portfolios received from Strategists and/or Managers.
- When providing tax overlay management services to the account, short-term gains are avoided where possible, but long-term gains are not limited unless you have requested a mandate to limit realized long-term gains.

The Overlay Manager will provide tax overlay management services with the assumption that the Overlay Manager will continue to provide services to the account for an entire tax year. The termination or removal of the overlay management services before the completion of an entire tax year may result

in adverse tax consequences, including without limitation realization of short-term capital gains. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

The Tax Overlay Management Services are offered at an additional cost to you.

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**Termination of Agreement**

A Client may terminate any of the aforementioned agreements at any time by notifying TRUE MEASURE WEALTH MANAGEMENT in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, TRUE MEASURE WEALTH MANAGEMENT will refund any unearned portion of the advance payment.

TRUE MEASURE WEALTH MANAGEMENT may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, TRUE MEASURE WEALTH MANAGEMENT will refund any unearned portion of the advance payment.

## **Fees and Compensation**

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**Description**

TRUE MEASURE WEALTH MANAGEMENT bases its fees on a percentage of assets under management, subscription fees, hourly charges, and fixed fees.

Advisory Agreements and Investment Management Agreements may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship.

Fees are negotiable.

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**Fee Billing**

Investment management fees are billed quarterly, in arrears, meaning that we invoice you after the three-month billing period has ended. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account. Investment management fees may be billed directly to the client if so requested in writing by the client.

Financial planning fees are billed annually or quarterly dependent upon client's preference.

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### **Other Fees**

Custodians may charge transaction fees on purchases or sales of certain securities. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

TRUE MEASURE WEALTH MANAGEMENT, in its sole discretion, may waive its financial planning fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

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### **Expense Ratios**

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to TRUE MEASURE WEALTH MANAGEMENT.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

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### **Past Due Accounts and Termination of Agreement**

TRUE MEASURE WEALTH MANAGEMENT reserves the right to stop work on any account that is more than 90 days overdue. In addition, TRUE MEASURE WEALTH MANAGEMENT reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in TRUE MEASURE WEALTH MANAGEMENT's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

## **Performance-Based Fees**

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### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

TRUE MEASURE WEALTH MANAGEMENT does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

## Types of Clients

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### Description

TRUE MEASURE WEALTH MANAGEMENT generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

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### Account Minimums

TRUE MEASURE WEALTH MANAGEMENT has no account minimums.

## Methods of Analysis, Investment Strategies and Risk of Loss

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### Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include the World Wide Web, financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

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### Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation focused on the goals and objectives of the client. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Other strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing.

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### Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular

underlying circumstances. For example, political, economic and social conditions may trigger market events.

- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Disciplinary Information**

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### **Legal and Disciplinary**

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

## **Other Financial Industry Activities and Affiliations**

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### **Financial Industry Activities**

TRUE MEASURE WEALTH MANAGEMENT has no other financial industry activities.



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**Affiliations**

TRUE MEASURE WEALTH MANAGEMENT has no arrangements that are material to its advisory or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

## **Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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**Code of Ethics**

The employees of TRUE MEASURE WEALTH MANAGEMENT have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

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**Participation or Interest in Client Transactions**

TRUE MEASURE WEALTH MANAGEMENT and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the TRUE MEASURE WEALTH MANAGEMENT Policies and Procedures Manual.

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**Personal Trading**

The Chief Compliance Officer of TRUE MEASURE WEALTH MANAGEMENT is Thad Hedin. He reviews all employee trades each quarter. His trades are reviewed by Patrick Tucker. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment.

## **Brokerage Practices**

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**Selecting Brokerage Firms**

TRUE MEASURE WEALTH MANAGEMENT does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. TRUE MEASURE WEALTH MANAGEMENT recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

TRUE MEASURE WEALTH MANAGEMENT currently custody's client accounts with SEI Private Trust Company, TD Ameritrade and Betterment.

TRUE MEASURE WEALTH MANAGEMENT does not receive transaction fees or commissions from any of these arrangements.

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**Best Execution**

TRUE MEASURE WEALTH MANAGEMENT reviews the execution of trades at each custodian and also the trading fees charged by each custodian. TRUE MEASURE WEALTH MANAGEMENT does not receive any portion of the trading fees.

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**Soft Dollars**

Due to TRUE MEASURE WEALTH MANAGEMENT's affiliations with custodians such as SEI Private Trust Company, TD Ameritrade and Betterment, TRUE MEASURE WEALTH MANAGEMENT may receive discounts on software purchases or other business services. All clients benefit from this discount as it reduces the firm's overall expenses.

The selection of SEI Private Trust Company, TD Ameritrade or Betterment as a custodian for clients is not affected by these nominal discounts.

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**Order Aggregation**

Most trades are through third party money managers, mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

## **Review of Accounts**

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**Periodic Reviews**

Patrick Tucker is the primary reviewer of client accounts. At his discretion, he may delegate review of a client's account to another qualified member of TRUE MEASURE WEALTH MANAGEMENT as seen appropriate. Each account is reviewed as changes in a client's expressed goals, needs or financial condition change. Certain accounts or groups of accounts may be reviewed in the event of significant changes in the market or sociopolitical factors deemed to affect those accounts.

## **Client Referrals**

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**Incoming Referrals**

TRUE MEASURE WEALTH MANAGEMENT has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

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**Referrals Out**

TRUE MEASURE WEALTH MANAGEMENT does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## **Custody**

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**Account Statements & Performance Reports**

The broker(s) and investment company(ies) carrying the client's account(s) send confirmations of each transaction directly to the client. Monthly statements may also be provided to the client. The monthly statements summarize all activity in the account. If an account has no activity in any specific month, a monthly statement may not be issued. In those instances statements will be issued quarterly. Clients participating in the SEI Asset Management programs will receive quarterly reports from SEI Private Trust Company indicating market value and performance as it relates to market indices and an annual tax report.

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**Net Worth Statements**

Clients are frequently provided net worth statements and net worth graphs that are generated from our financial planning software. Net worth statements contain approximations of account balances provided by the client.

## **Investment Discretion**

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**Discretionary Authority for Trading**

TRUE MEASURE WEALTH MANAGEMENT accepts discretionary authority to manage securities accounts on behalf of clients. TRUE MEASURE WEALTH MANAGEMENT has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, TRUE MEASURE WEALTH MANAGEMENT consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. TRUE MEASURE WEALTH MANAGEMENT does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in the client's accounts on the client's behalf so that we may promptly implement the client's expressed goals.

Discretionary trading authority is given to TRUE MEASURE WEALTH MANAGEMENT upon the client's signature on TRUE MEASURE WEALTH MANAGEMENT's management agreements.

If client selects management services that utilize an Overlay Manager, client will grant the Overlay Manager complete and unlimited discretionary trading authority with respect to client's account upon client's signature on acting custodian's application. The Overlay Manager will be solely responsible for the day-to-day investment management decisions for client's account, and TRUE MEASURE WEALTH MANAGEMENT will not be responsible for making the investment trading decisions.

## **Voting Client Securities**

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### **Proxy Votes**

TRUE MEASURE WEALTH MANAGEMENT does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, TRUE MEASURE WEALTH MANAGEMENT will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

## **Financial Information**

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### **Financial Condition**

TRUE MEASURE WEALTH MANAGEMENT does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because TRUE MEASURE WEALTH MANAGEMENT does not serve as a custodian for client funds or securities, and does not require prepayment of asset management fees of more than \$1,200 per client, and six months or more in advance.

## **Business Continuity Plan**

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### **General**

TRUE MEASURE WEALTH MANAGEMENT has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

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### **Disasters**

The Business Continuity Plan covers natural disasters such as snow storms, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, fire, bomb threat, nuclear emergency, chemical event,

biological event, and Internet outage. Electronic files are backed up daily and archived offsite.

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**Alternate Offices**

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

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**Loss of Key Personnel**

TRUE MEASURE WEALTH MANAGEMENT has a Business Continuation Agreement with another financial advisory firm to support TRUE MEASURE WEALTH MANAGEMENT in the event of Patrick Tucker's serious disability or death.

## **Information Security Program**

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**Information Security**

TRUE MEASURE WEALTH MANAGEMENT maintains an information security program to reduce the risk that your personal and confidential information may be breached.

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**Privacy Notice**

TRUE MEASURE WEALTH MANAGEMENT requires that you provide current and accurate financial and personal information. TRUE MEASURE WEALTH MANAGEMENT will protect the information you have provided in a manner that is safe, secure and professional. TRUE MEASURE WEALTH MANAGEMENT and its employees are committed to protecting your privacy and to safeguarding that information.

**Safeguarding Customer Documents**

We collect non-public customer data in checklists, forms, in written notations, and in documentation provided to us by our customers for evaluation, registration, licensing or related consulting services. We also create internal lists of such data.

During regular business hours access to customer records is monitored so that only those with approval may access the files. During hours in which the company is not in operation, the customer records will be locked.

No individual who is not so authorized shall obtain or seek to obtain personal and financial customer information. No individual with authorization to access personal and financial customer information shall share that information in any manner without the specific consent of a firm principal. Failure to observe TRUE MEASURE WEALTH MANAGEMENT's procedures regarding customer and consumer privacy will result in discipline and may lead to termination.

**Sharing Nonpublic Personal and Financial Information**

TRUE MEASURE WEALTH MANAGEMENT is committed to the protection and privacy of its customers' and consumers' personal and financial information. TRUE MEASURE WEALTH MANAGEMENT will not share such information with any affiliated or nonaffiliated third party except:

When necessary to complete a transaction in a customer account, such as with the clearing firm or account custodians;

- When required to maintain or service a customer account;
- To resolve customer disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the customer;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- To comply with federal, state or local laws, rules and other applicable legal requirements;
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
- In any circumstances with the customer's instruction or consent

### **Opt-Out Provisions**

It is not a policy of TRUE MEASURE WEALTH MANAGEMENT. to share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service customer accounts or is mandated by law, there are no allowances made for clients to opt out.

## **Brochure Supplement**

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### **Education and Business Standards**

TRUE MEASURE WEALTH MANAGEMENT requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning.

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### **Patrick K. Tucker**

Date of birth: 07/13/1964

Educational Background:

- University of St. Thomas in St. Paul, MN – Undergraduate degree in Business Administration - Accounting
- The American College in Bryn Mawr, PA – Completed extensive coursework in financial education
- Successfully completed the NASD Series 7, 63, and 65 exams

Business Experience:

Patrick K. Tucker, President, purchased MERIDIAN MANAGEMENT now TRUE MEASURE WEALTH MANAGEMENT in 2001. He has been actively working with clients in the securities industry for over twenty years. He was employed at United Parcel Service working in the company's corporate finance and accounting group from 1985 until 1995. He worked as a registered representative at American Express Financial Advisors in Omaha, NE from 1995 to 1998, at Investment One - First National Bank of Omaha, NE from 1998 through July of 2001, and with Spectrum Capital located in Omaha, NE from 2001 through May 2007.

Disciplinary Information: None

Other Business Activities: Fiir, Financial Advisor Consultation & Training

Supervision:

Patrick Tucker is supervised by Thaddeus Hedin, Chief Compliance Officer. He reviews Patrick Tucker's work through frequent office interactions. He also reviews Patrick Tucker's activities through True Measure's client relationship management system.

Thaddeus Hedin's contact information:

Phone: (402) 342-1400

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**Steven M. LaFleur**

Date of birth: 03/30/1990

Educational Background:

- University of Nebraska-Lincoln in Lincoln, NE – Undergraduate degree in Finance
- Successfully completed the NASD Series 65 exam

Business Experience:

Steven M. LaFleur, Financial Advisor at True Measure Wealth Management, Inc. Steven was employed at First American Title Company of South Dakota as a title examiner for three years after graduating from the University of Nebraska-Lincoln.

Disciplinary Information: None

Other Business Activities: None

Supervision:

Steven LaFleur is supervised by Thaddeus Hedin, Chief Compliance Officer. He reviews Steven LaFleur's work through frequent office interactions. He also reviews Steven LaFleur's activities through True Measure's client relationship management system.

Thaddeus Hedin's contact information:

Phone: (402) 342-1400