

Item 1 – Cover Page

Titan Retirement Advisors LLC
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Date of Disclosure Brochure: March 28, 2022

This disclosure brochure provides information about the qualifications and business practices of Titan Retirement Advisors LLC (also referred to as we, us and Titan Retirement Advisors throughout this disclosure brochure). If you have any questions about the contents of this disclosure brochure, please contact Joshua Coughran at 713-239-2866 or josh@investtitan.com. The information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Titan Retirement Advisors is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information on this website by searching for Titan Retirement Advisors LLC or our firm's CRD number 166359.

*Registration as an investment adviser does not imply a certain level of skill or training.

Item 2 – Material Changes

There are no material changes in this brochure from the last annual updating amendment of Titan Retirement Advisors LLC on March 26, 2021. Material changes relate to Titan Retirement Advisors LLC's policies, practices or conflicts of interests only.

We will ensure that you receive a summary of any material changes to this and subsequent disclosure brochures within 90 days after our firm's fiscal year ends. Our firm's fiscal year ends on December 31, so you will receive the summary of material changes no later than April 30 each year. At that time we will also offer or provide a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

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Item 4 – Advisory Business

Titan Retirement Advisors is a limited liability company (LLC) formed under the laws of the State of Texas.

- Joshua J. Coughran is a Managing Member and Chief Compliance Officer of Titan Retirement Advisors. Joshua J. Coughran owns 99.00% of Titan Retirement Advisors. Full details of the education and business background of Joshua J. Coughran are provided at *Item 19* of this Disclosure Brochure.
- Titan Retirement Advisors became registered as an investment adviser in May 2013.

Introduction

The investment advisory services of Titan Retirement Advisors are provided to you through an appropriately licensed and qualified individual who is an investment adviser representative of Titan Retirement Advisors (referred to as your investment adviser representative throughout this brochure).

Description of Advisory Services

The following are descriptions of the primary advisory services of Titan Retirement Advisors. Please understand that a written agreement, which details the exact terms of the service, must be signed by you and Titan Retirement Advisors before we can provide you the services described below.

Asset Management Services – Titan Retirement Advisors offers asset management services, which involves Titan Retirement Advisors providing you with continuous and ongoing supervision over your specified accounts.

You must appoint our firm as your investment adviser of record on specified accounts (collectively, the "Account"). The Account consists only of separate account(s) held by qualified custodian(s) under your name. The qualified custodians maintain physical custody of all funds and securities of the Account, and you retain all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the Account.

The Account is managed by us based on your financial situation, investment objectives and risk tolerance. We actively monitor the Account and provide advice regarding buying, selling, reinvesting or holding securities, cash or other investments of the Account.

We will need to obtain certain information from you to determine your financial situation and investment objectives. You will be responsible for notifying us of any updates regarding your financial situation, risk tolerance or investment objective and whether you wish to impose or modify existing investment restrictions; however we will contact you at least annually to discuss any changes or updates regarding your financial situation, risk tolerance or investment objectives. We are always reasonably available to consult with you relative to the status of your Account. You have the ability to impose reasonable

restrictions on the management of your accounts, including the ability to instruct us not to purchase certain securities.

It is important that you understand that we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you or actions taken for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

Retirement Plan Services - Titan Retirement Advisors offers retirement plan services to retirement plan sponsors and to individual participants in retirement plans. For a corporate sponsor of a retirement plan, our retirement plan services can include, but are not limited to, the following services:

Fiduciary Consulting Services

Titan Retirement Advisors provides the following Fiduciary Retirement Plan Consulting Services:

- Investment Policy Statement Preparation. Titan Retirement Advisors will help you develop an investment policy statement. The investment policy statement establishes the investment policies and objectives for the Plan. You will have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the investment policy statement.
- Investment Selection Services. Titan Retirement Advisors will provide you with recommendations of investment options consistent with ERISA section 404(c).
- Investment Due Diligence Review. Titan Retirement Advisors will provide you with periodic due diligence reviews of the Plan's reports, investment options and recommendations.
- Investment Monitoring. Titan Retirement Advisors will assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformation to the guidelines set forth in the investment policy statement and Titan Retirement Advisors will make recommendations to maintain or remove and replace investment options.
- Individualized Participant Advice. Upon request, Titan Retirement Advisors will provide one-on-one advice to plan participants regarding their individual situations.
- Retirement Plan Committee Charter Preparation. Upon request, Titan Retirement Advisors will assist in the preparation of the Retirement Plan Committee Charter.

For Fiduciary Consulting Services, all recommendations of investment options and portfolios will be submitted to you for your ultimate approval or rejection. For retirement plan Fiduciary Consulting Services, the retirement plan sponsor client or the plan participant who elects to implement any recommendations made by us is solely responsible for implementing all transactions.

Fiduciary Consulting Services are not management services, and Titan Retirement Advisors does not serve as administrator or trustee of the plan. Titan Retirement Advisors does not act as custodian for any client account or have access to client funds or securities (with the exception of, some accounts, having written authorization from the client to deduct our fees).

Titan Retirement Advisors acknowledges that in performing the Fiduciary Consulting Services listed above that it is acting as a “fiduciary” as such term is defined under Section 3(21)(A)(ii) of Employee Retirement Income Security Act of 1974 (“ERISA”) for purposes of providing non-discretionary investment advice only. Titan Retirement Advisors will act in a manner consistent with the requirements of a fiduciary under ERISA if, based upon the facts and circumstances, such services cause Titan Retirement Advisors to be a fiduciary as a matter of law. However, in providing the Fiduciary Consulting Services, Titan Retirement Advisors (a) has no responsibility and will not (i) exercise any discretionary authority or discretionary control respecting management of Client’s retirement plan, (ii) exercise any authority or control respecting management or disposition of assets of Client’s retirement plan, or (iii) have any discretionary authority or discretionary responsibility in the administration of Client’s retirement plan or the interpretation of Client’s retirement plan documents, (b) is not an “investment manager” as defined in Section 3(38) of ERISA and does not have the power to manage, acquire or dispose of any plan assets, and (c) is not the “Administrator” of Client’s retirement plan as defined in ERISA.

Fiduciary Management Services

Titan Retirement Advisors provides clients with the following Fiduciary Retirement Plan Management Services:

- Discretionary Management Services. Titan Retirement Advisors will provide you with continuous and ongoing supervision over the designated retirement plan assets. Titan Retirement Advisors will actively monitor the designated retirement plan assets and provide advice regarding buying, selling, reinvesting or holding securities, cash or other investments of the Plan. We have discretionary authority to make all decisions to buy, sell or hold securities, cash or other investments for the designated retirement plan assets in the our sole discretion without first consulting with you. We also have the power and authority to carry out these decisions by giving instructions, on your behalf, to brokers and dealers and the qualified custodian(s) of the Plan for our management of the designated retirement plan assets.
- Discretionary Investment Selection Services. Titan Retirement Advisors will monitor the investment options of the Plan and add or remove investment options for the Plan. Titan Retirement Advisors will have discretionary authority to make all decisions regarding the investment options that will be made available to Plan participants.
- Investment Management via Model Portfolios. Titan Retirement Advisors will provide discretionary management via model portfolios. Titan Retirement Advisors manages Model Portfolios which are investment options available to Plan participants.

If you elect to utilize any of Titan Retirement Advisors' Fiduciary Management Services, then Titan Retirement Advisors will be acting as an Investment Manager to the Plan, as defined by ERISA section 3(38), with respect to our Fiduciary Management Services, and Titan Retirement Advisors hereby acknowledges that it is a fiduciary with respect to its Fiduciary Management Services.

Non-Fiduciary Services

Although an investment adviser is considered a fiduciary under the Investment Advisers Act of 1940 and required to meet the fiduciary duties as defined by the Advisers Act, the services listed here as non-fiduciary should not be considered fiduciary services for the purposes of ERISA since Advisor is not acting as a fiduciary to the Plan as the term "fiduciary" is defined in Section 3(21)(A)(ii) of ERISA. The exact suite of services provided to a client will be listed and detailed in the Qualified Retirement Plan Agreement.

Titan Retirement Advisors provides clients with the following Non-Fiduciary Retirement Plan Consulting Services:

- Participant Education. Titan Retirement Advisors will provide education services to Plan participants about general investment principles and the investment alternatives available under the Plan. Titan Retirement Advisors' assistance in participant investment education will be consistent with and within the scope of DOL Interpretive Bulletin 96-1. Education presentations will not take into account the individual circumstances of each participant and individual recommendations will not be provided unless otherwise agreed upon. Plan participants are responsible for implementing transactions in their own accounts.
- Due Diligence Review. Titan Retirement Advisors will provide you with periodic due diligence reviews of your Plan's fees and expenses and your Plan's service providers.
- Benchmarking. Titan Retirement Advisors will provide you benchmarking services and will provide analysis concerning the operations of the Plan.

We can also meet with individual participants to discuss their specific investment risk tolerance, investment time frame and investment selections.

Securities and other types of investments all bear different types and levels of risk. Those risks are typically discussed with clients in defining the investment policies and objectives that will guide investment decisions for their qualified plan accounts. Upon request, as part of our retirement plan services, we can discuss those investments and investment strategies that we believe may tend to reduce these risks for a particular client's circumstances and plan participants.

Clients and plan participants must realize that obtaining higher rates of return on investments entails accepting higher levels of risk. Based upon discussions with the client, we will attempt to identify the balance of risks and rewards that is appropriate and comfortable for the client and other employees. It is still the clients' responsibility to ask questions if the client does not fully understand the risks associated with any investment. All plan participants are strongly encouraged to read prospectuses, when applicable, and ask questions prior to investing.

We strive to render our best judgment for clients. Still, Titan Retirement Advisors cannot assure that investments will be profitable or assure that no losses will occur in their portfolios. Past performance is an important consideration with respect to any investment or investment advisor, but it is not necessarily an accurate predictor of future performance.

Titan Retirement Advisors will disclose, to the extent required by ERISA Regulation Section 2550.408b-2(c), to you any change to the information that we are required to disclose under ERISA Regulation Section 2550.408b-2(c)(1)(iv) as soon as practicable, but no later than sixty (60) days from the date on which we are informed of the change (unless such disclosure is precluded due to extraordinary circumstances beyond our control, in which case the information will be disclosed as soon as practicable).

In accordance with ERISA Regulation Section 2550.408b-2(c)(vi)(A), we will disclose within thirty (30) days following receipt of a written request from the responsible plan fiduciary or Plan Administrator (unless such disclosure is precluded due to extraordinary circumstances beyond our control, in which case the information will be disclosed as soon as practicable) all information related to the Qualified Retirement Plan Agreement and any compensation or fees received in connection with the Agreement that is required for the Plan to comply with the reporting and disclosure requirements of Title 1 of ERISA and the regulations, forms and schedules issued thereunder.

If we make an unintentional error or omission in disclosing the information required under ERISA Regulation Section 2550.408b-2(c)(1)(iv) or (vi), we will disclose to you the correct information as soon as practicable, but no later than thirty (30) days from the date on which we learn of such error or omission.

Newsletters

Titan Retirement Advisors occasionally prepares general, educational and informational newsletters. Newsletters are always offered on an impersonal basis and do not focus on the needs of a specific individual. Some newsletter content may be produced by third parties.

Workshops

Titan Retirement Advisors offers educational, informative and motivational workshops to the public as well as to associations, family foundations and employers. Workshops are always offered on an impersonal basis and do not focus on the individual needs of the participants.

Specialization

Titan Retirement Advisors specializes in providing asset management services to corporate retirement plans.

Limits Advice to Certain Types of Investments

Titan Retirement Advisors provides investment advice on the following types of investments:

- Exchange Traded Funds (ETFs)
- Mutual Funds
- Insurance
- Real Estate Investments

- Real Estate Investment Trusts (REITs)
- Tenant in Common Investments (TICs)
- Private Placement Investments

Although we generally provide advice only on the products previously listed, we reserve the right to offer advice on any investment product that may be suitable for each client's specific circumstances, needs, goals and objectives.

When providing asset management services, Titan Retirement Advisors typically constructs each client's account holdings using ETFs and Mutual Funds to build diversified portfolios. Certain client portfolios may be constructed utilizing any of the investment options referenced above. It is not our typical investment strategy to attempt to time the market, but we may increase cash holdings modestly as deemed appropriate based on your risk tolerance and our expectations of market behavior. We may modify our investment strategy to accommodate special situations as needed by the client.

(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)

Tailor Advisory Services to Individual Needs of Clients

Titan Retirement Advisors' advisory services are always provided based on your individual needs. This means, for example, that when we provide asset management services, you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. We work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information.

We will not enter into an investment adviser relationship with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

When managing client accounts through our firm's Asset Management Services program, we may manage a client's account in accordance with one or more investment models. When client accounts are managed using models, investment selections are based on the underlying model and we do not develop customized (or individualized) portfolio holdings for each client. However, the determination to use a particular model or models is always based on each client's individual investment goals, objectives and mandates.

Client Assets Managed by Titan Retirement Advisors

As of December 2021, Titan Retirement Advisors managed \$30,000,000.00 on a discretionary basis, and \$150,000,000.00 on a non-discretionary basis.

Item 5 – Fees and Compensation

In addition to the information provided in *Item 4 – Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements. It should be noted that lower fees for comparable service may be available from other

sources. The exact fees and other terms will be outlined in the agreement between you and Titan Retirement Advisors.

Asset Management Services

Fees charged for our separate account asset management services are charged in arrears based on a percentage of assets under management and are calculated based on the daily average balance of the account over the billing period. Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period. If asset management services are commenced in the middle of the billing period, then the prorated fee for that billing period will be billed in arrears at the end of that billing period.

The asset management services continue until terminated by either party (i.e., Titan Retirement Advisors or you) by giving thirty (30) days written notice to the other party. When fees are billed in arrears, Titan Retirement Advisors will prorate the final fee payment based on the number of days services are provided during the final period. The amount of client assets on the termination date will be used to determine the final fee payment.

Fees charged for our asset management services are negotiable based on the type of client, the complexity of the client's situation, the composition of the client's account, the potential for additional account deposits, the relationship of the client with the investment adviser representative, and the total amount of assets under management for the client.

The annual fee for our individual client separate account asset management services will range between 1.00% and 2.00%. The actual fee that will be charged to a client account will be specified in the Client Agreement which is required to be executed prior to the implementation of our investment advisory services.

Titan Retirement Advisors believes that its annual fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs. However, our annual investment advisory fee may be higher than that charged by other investment advisers offering similar services/programs. In addition to our compensation, you may also incur charges imposed at the mutual fund level (e.g., advisory fees and other fund expenses).

You can choose how to pay your investment advisory fees. The investment advisory fees can be deducted from your account and paid directly to our firm by the qualified custodian(s) of your account or you can pay our firm upon receipt of a billing notice sent directly to you.

If you choose to have the investment advisory fees deducted from your account, you must authorize the qualified custodian(s) of your account to deduct fees from your account and pay such fees directly to Titan Retirement Advisors. Our firm will send you a billing statement prior to the time that fee deduction instruction is sent to the qualified custodian(s) of your account. The billing statement will detail the formula used to calculate the fee, the assets under management and the time period covered.

You should review your account statements received from the qualified custodian(s) and verify that appropriate investment advisory fees are being deducted. The qualified custodian(s) will not verify the accuracy of the investment advisory fees deducted.

If you choose to pay the fees after receiving a statement, fees are due upon your receipt of a billing notice sent directly to you. The billing notice will detail the formula used to calculate the fee, the assets under management and the time period covered. Fees for the services of our firm will be due immediately after your receipt of the billing notice.

Brokerage commissions and/or transaction ticket fees charged by the qualified custodian are billed directly to you by the qualified custodian. Titan Retirement Advisors does not receive any portion of such commissions or fees from you or the qualified custodian. In addition, you may incur certain charges imposed by third parties other than Titan Retirement Advisors in connection with investments made through your account including, but not limited to, mutual fund sales loads, 12(b)-1 fees and surrender charges, variable annuity fees and surrender charges, IRA and qualified retirement plan fees, and charges imposed by the qualified custodian(s) of your account. Management fees charged by Titan Retirement Advisors are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus.

Retirement Plan Services

For retirement plan sponsor clients, Titan Retirement Advisors will charge a fixed annual fee, an hourly fee or an annual fee that is calculated as a percentage of the value of plan assets. This fee is negotiable based upon the complexity of the plan, the size of the plan assets, the actual services requested and the potential for additional deposits.

If Titan Retirement Advisors charges an annual fee based upon the value of the plan assets for our Retirement Plan Services, we charge an annual fee of between 0.05% to 0.50%. The actual fee that will be charged to retirement plan will be specified in the Client Agreement which is required to be executed prior to the implementation of our investment advisory services.

If Titan Retirement Advisors charges a fixed annual fee for our Retirement Plan Services, we typically charge an annual fixed fee of a minimum of \$10,000. The exact amount of the fixed fee will be specified in your agreement with Titan Retirement Advisors. At our sole discretion you may be required to pay a portion of the fixed fee up front in the form of a retainer; however, at no time will we require payment of more than \$500 in fees more than six months in advance. Upon completion of the services, the fixed fee is considered earned by Titan Retirement Advisors and any unpaid amount is immediately due.

If Titan Retirement Advisors charges hourly rates for our Retirement Plan Services, the hourly rate for retirement plan services is \$250 per hour. If the client and Titan Retirement Advisors have agreed that services will be provided on an hourly basis, fees will be estimated before consulting services are initiated. Should additional time be required, Titan Retirement Advisors will notify the client in advance in writing, with an appropriate explanation that additional time will be needed to complete the desired service. At our sole discretion you may be required to pay a portion of the fee up front in the form of a retainer. At no time will we require payment of more than \$500 in fees more than six months in advance.

For retirement plan sponsors and participants, fees are billed in arrears (at the end of the billing period) on a quarterly calendar basis and calculated based on the fair market value of your account as of the last business day of the previous billing period. Fees are prorated (based on the number of days service is

provided during the initial billing period) for your account opened at any time other than the beginning of the billing period.

Clients can elect to have the fee deducted from their account or billed directly and due upon receipt of the billing notice. If clients elect to have the fee automatically deducted from an existing account, they are required to provide the custodian with written authorization to deduct the fees from the account and pay the fees to Titan Retirement Advisors. We will provide the custodian with a fee notification statement.

The services will terminate upon thirty (30) days following either party providing the other party with written notice. If services are terminated within five business days of signing the client agreement, services are terminated without penalty. Any prepaid but unearned fees are promptly refunded to the client at the effective date of termination.

Titan Retirement Advisors does not reasonably expect to receive any other compensation, direct or indirect, for its Services. If we receive any other compensation for such services, we will (i) offset that compensation against our stated fees, and (ii) will disclose the amount of such compensation, the services rendered for such compensation and the payer of such compensation to you.

Newsletters

Newsletters are provided to clients and prospective clients free of charge.

Workshops

We may either provide the workshops for free or charge a fee. Workshop fees are only charged to the workshop sponsor and not to attendees. The fee generally will not exceed \$5,000 dependent upon the amount of travel required, the workshop topic(s), length, materials provided and anticipated participants. If a fee is charged, we provide payment terms and cancellation procedures to sponsors and anticipated participants.

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

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. *Item 6* is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees.

Item 7 – Types of Clients

Titan Retirement Advisors currently serves 25 advisory clients at the time of this filing.

The firm generally provides investment advice to the following types of clients:

- Individuals
- High net worth individuals
- Pension and profit sharing plans

You will be required to execute a written agreement with Titan Retirement Advisors specifying the particular advisory services in order to establish a client arrangement with Titan Retirement Advisors.

Minimum Investment Amounts Required

There are no minimum investment amounts required for establishing an account managed by Titan Retirement Advisors. However, there is a minimum \$10,000 annual fee that has been established for retirement plan relationships that are billed on a fixed fee basis. All clients are required to execute an agreement for services in order to establish a client arrangement with Titan Retirement Advisors and/or the third-party money manager or the sponsor of third-party money manager platforms.

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

Methods of Analysis

Titan Retirement Advisors uses Style Box and Time Horizon based analysis in formulating our investment advice.

Style Box Analysis – The analysis of investment characteristics that allows for informed comparisons and portfolio construction based on actual holdings within mutual funds and ETFs and the underlying characteristics of other investment vehicles that may be appropriate for a client's portfolio. Analysis of the style factor characteristics can assist in identifying relevant market trends for building risk-appropriate client portfolios.

Time Horizon Analysis – The analysis of investment characteristics that allows for portfolio construction based on the investment time horizon of the client.

There are risks involved in using any analysis method.

Investment Strategies

Titan Retirement Advisors uses Style Box and Time Horizon based asset allocation for the management of client portfolios.

Style Box Management - An active management portfolio strategy that constructs investment portfolios and monitors performance based on an investment's inherent style characteristics and best aligned benchmark while focusing on style box allocations that are in favor (as measured by performance compared to the other style box components) through the various market cycles.

Long term purchases. Investments held at least a year.

Tactical asset allocation. Allows for a range of percentages in each asset class (such as Stocks = 40-50%). The ranges establish minimum and maximum acceptable percentages that permit the investor to take advantage of market conditions within these parameters. Thus, a minor form

of market timing is possible, since the investor can move to the higher end of the range when stocks are expected to do better and to the lower end when the economic outlook is bleak.

Strategic asset allocation. Calls for setting target allocations and then periodically rebalancing the portfolio back to those targets as investment returns skew the original asset allocation percentages. The concept is akin to a “buy and hold” strategy, rather than an active trading approach. Of course, the strategic asset allocation targets may change over time as the client’s goals and needs change and as the time horizon for major events such as retirement and college funding grow shorter.

Investment Models

Titan Target Date Portfolios

- **Growth/2055** - This portfolio is for investors who consider capturing a majority of the market’s gains as their primary objective.
- **Moderate Growth/2045** - This portfolio is for investors who consider growth of capital their primary objective, but wish to avoid the price swings of the general market.
- **Moderate/2035** - This portfolio is for investors who consider growth of capital important, but want to safeguard a portion of their money to meet retirement objectives.
- **Moderate Conservative/2025** - This portfolio is for investors who can bear some risk and want to maximize returns on a portion of their investment, but do not desire to accept large price swings.
- **Conservative/2020** - This portfolio is for investors who can bear some risk, but want to emphasize protection of principal more than capital growth.
- **Conservative Income/2015** - This portfolio is for investors who wish to avoid risk and emphasize protection of principal as their primary objective with some opportunity for growth

Primarily Recommend One Type of Security

Titan Retirement Advisors primarily recommends ETFs and Mutual Funds.

In simple terms, ETFs are funds that hold all the securities in an index (e.g., the U.S. Dow) and trade like a stock. In an ETF, the manager’s job is to keep the portfolio as close to its index as possible rather than to make judgments on a single security. To keep the portfolio aligned with its index, the manager must buy the stock in the index regardless of the security’s price. There are also risks associated with ETFs:

- **Geographical Limitations:** The United States has many ETF products but some countries have only a few ETFs available with limited products (e.g., only large-cap products).
- **Trading Limitations:** If ETFs have large trading volumes, the advantage of purchasing it over an index or equity diminishes. In addition, active ETFs can increase trading fees and expenses.

- **Investment Horizon Limitation:** The trading opportunities of an ETF may be more suitable for a short-term investor than a long-term investor.
- **Inactivity Limitation:** Some ETFs are not as actively traded as others and investing in actively managed mutual fund may be more effective.
- **Tax Limitations:** Tax laws vary from state to state and country to country. For foreign investments, it may be more advantageous to find another product.

Different mutual fund categories have different risk characteristics and investors should not compare different categories. For example, a bond fund and a stock fund that both have below average risk still have different risk/return potential (stock funds traditionally have higher risk/return potential). Risks are based on the investments held in the fund. For example, a bond fund faces interest rate risk and income risk and income is affected by the change in interest rates. A sector fund (investing in a single industry) is at risk that its price will decline due to industry developments. The following are some risks to consider when investing in mutual funds:

- **Call Risk:** A bond issuer may redeem high-yield bonds before maturity date due to falling interest rates.
- **Default Risk:** A bond issuer may fail to repay interest and principal.
- **Income Risk:** Dividends in a fixed income fund may decline due to falling interest rates.
- **Geology Risk:** Political events, natural disasters or financial problems may weaken a country or state's economy and cause investments to decline.
- **Industry Risk:** Stocks in a single industry may decline due to developments in that industry.
- **Inflation Risk:** Increases in the cost of living can reduce or eliminate a fund's actual returns when adjusted for inflation.
- **Manager Risk:** A manager may not execute the fund's investment strategy in a timely or effective manner.

Risk of Loss

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below:

- **Market Risk** – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- **Equity (stock) market risk** – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and

perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.

- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- Fixed Income Risk. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk – When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

Item 9 – Disciplinary Information

Item 9 is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

Item 10 – Other Financial Industry Activities and Affiliations

Titan Retirement Advisors is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a

banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, an insurance company or agency, a pension consultant and a sponsor or syndicator of limited partnerships.

We are an independent registered investment adviser and only provide investment advisory services. We are not engaged in any other business activities and offer no other services except those described in this Disclosure Brochure. However, while we do not sell products or services other than investment advice, our representatives may sell other products or provide services outside of their role as investment adviser representatives with us.

Real Estate Agent

Joshua J. Coughran, an investment adviser representative with Titan Retirement Advisors, is a licensed real estate agent in the State of California. He will receive separate compensation when providing these services.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Summary

An investment adviser is considered a fiduciary and has a fiduciary duty to all clients. Titan Retirement Advisors has established a Code of Ethics to comply with the requirements of the securities laws and regulations that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics also requires compliance with federal securities laws. Titan Retirement Advisors' Code of Ethics covers all individuals that are classified as "supervised persons". All employees, officers, directors and investment adviser representatives are classified as supervised persons. Titan Retirement Advisors requires its supervised persons to consistently act in your best interest in all advisory activities. Titan Retirement Advisors imposes certain requirements on its affiliates and supervised persons to ensure that they meet the firm's fiduciary responsibilities to you. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is intended to provide a summary description of the Code of Ethics of Titan Retirement Advisors. If you wish to review the Code of Ethics in its entirety, you should send us a written request and upon receipt of your request, we will promptly provide a copy of the Code of Ethics to you.

Affiliate and Employee Personal Securities Transactions Disclosure

Titan Retirement Advisors or associated persons of the firm may buy or sell for their personal accounts, investment products identical to those recommended to clients. This creates a potential conflict of interest. It is the express policy of Titan Retirement Advisors that all persons associated in any manner with our firm must place clients' interests ahead of their own when implementing personal investments. Titan Retirement Advisors and its associated persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry.

We are now and will continue to be in compliance with applicable state and federal rules and regulations.

To prevent conflicts of interest, we have developed written supervisory procedures that include personal investment and trading policies for our representatives, employees and their immediate family members (collectively, associated persons):

- Associated persons cannot prefer their own interests to that of the client.
- Associated persons cannot purchase or sell any security for their personal accounts prior to implementing transactions for client accounts.
- Associated persons cannot buy or sell securities for their personal accounts when those decisions are based on information obtained as a result of their employment, unless that information is also available to the investing public upon reasonable inquiry.
- Associated persons are prohibited from purchasing or selling securities of companies in which any client is deemed an “insider”.
- Associated persons are discouraged from conducting frequent personal trading.
- Associated persons are generally prohibited from serving as board members of publicly traded companies unless an exception has been granted to the Chief Compliance Officer of Titan Retirement Advisors.

Any associated person not observing our policies is subject to sanctions up to and including termination.

Item 12 – Brokerage Practices

Clients are under no obligation to act on the financial planning recommendations of Titan Retirement Advisors. If the firm assists in the implementation of any recommendations, we are responsible to ensure that the client receives the best execution possible. Best execution does not necessarily mean that clients receive the lowest possible commission costs but that the qualitative execution is best. In other words, all conditions considered, the transaction execution is in your best interest. When considering best execution, we look at a number of factors besides prices and rates including, but not limited to:

- Execution capabilities (e.g., market expertise, ease/reliability/timeliness of execution, responsiveness, integration with our existing systems, ease of monitoring investments)
- Products and services offered (e.g., investment programs, back office services, technology, regulatory compliance assistance, research and analytic services)
- Financial strength, stability and responsibility
- Reputation and integrity
- Ability to maintain confidentiality

We exercise reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transaction by considering the back office services, technology and pricing of services offered.

Brokerage Recommendations

You are under no obligation to act on the financial planning recommendations of Titan Retirement Advisors. If we assist you in the implementation of any recommendations we are responsible to ensure that you receive the best execution possible. An independent qualified custodial broker dealer will be

used as the broker/dealer for your account. Titan Retirement Advisors is independently owned and operated and not affiliated with any broker dealer.

At least annually, we will review alternative custodians in the marketplace for comparison to the currently used custodian, evaluating criteria such as overall expertise, cost competitiveness, and financial condition. Quality of execution for custodians will be reviewed through trade journal evaluations.

The primary factor in suggesting a broker/dealer or custodian is that the services of the recommended firm are provided in a cost-effective manner. While quality of execution at the best price is an important determinant, best execution does not necessarily mean lowest price and it is not the sole consideration. The trading process of any broker/dealer and money manager suggested by Titan Retirement Advisors must be efficient, seamless, and straight-forward. Overall custodial support services, trade correction services, and statement preparation are some of the other factors determined when suggesting a broker/dealer.

Directed Brokerage

Clients are allowed to select the broker-dealer that will be used for their accounts. Clients directing the use of a particular broker/dealer or other custodian must understand that we may not be able to obtain the best prices and execution for the transaction. Under a client-directed brokerage arrangement, clients may receive less favorable prices than would otherwise be the case if the client had not designated a particular broker/dealer or custodian. Directed brokerage account trades are generally placed by Titan Retirement Advisors after effecting trades for other clients of Titan Retirement Advisors. In the event that a client directs Titan Retirement Advisors to use a particular broker or dealer, Titan Retirement Advisors may not be authorized to negotiate commissions and may be unable to obtain volume discounts or best execution. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to clients who direct Titan Retirement Advisors to use a particular broker or dealer versus clients who do not direct the use of a particular broker or dealer.

Soft Dollar Benefits

An investment adviser receives soft dollar benefits from a broker-dealer when the investment adviser receives research or other products and services in exchange for client securities transactions or maintaining an account balance with the broker-dealer.

Titan Retirement Advisors does not have a soft dollar agreement with a broker-dealer or a third-party.

Handling Trade Errors

Titan Retirement Advisors has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with its fiduciary duty, it is the policy of Titan Retirement Advisors to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client is responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client is made whole and any loss resulting from the trade error is absorbed by Titan Retirement Advisors if the error is caused by Titan Retirement Advisors. If the error is caused by

the broker-dealer, the broker-dealer is responsible for handling the trade error. If an investment gain results from the correcting trade, the gain remains in the client's account unless the same error involved other client account(s) that should also receive the gains. It is not permissible for all clients to retain the gain. Titan Retirement Advisors may also confer with a client to determine if the client should forego the gain (e.g., due to tax reasons).

Titan Retirement Advisors will never benefit or profit from trade errors.

Block Trading Policy

Investment advisors may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. Titan Retirement Advisors does not engage in block trading.

It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy is to implement all client orders on an individual basis. Therefore, we do not aggregate or "block" client transactions. Considering the types of investments we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

Agency Cross Transactions

Our associated persons are prohibited from engaging in agency cross transactions, meaning we cannot act as brokers for both the sale and purchase of a single security between two different clients and cannot receive compensation in the form of an agency cross commission or principal mark-up for the trades.

Item 13 – Review of Accounts

Account Reviews and Reviewers

Managed accounts are reviewed at least quarterly. While the calendar is the main triggering factor, reviews can also be conducted at your request. Account reviews will include investment strategy and objectives review and making a change if strategy and objectives have changed. Reviews are conducted by Josh Coughran with reviews performed in accordance with your investment goals and objectives.

Statements and Reports

For our asset management services, you are provided with transaction confirmation notices and regular quarterly account statements directly from the qualified custodian.

You are encouraged to always compare any reports or statements provided by us, a sub-adviser or third-party money manager against the account statements delivered from the qualified custodian. When you

have questions about your account statement, you should contact our firm and the qualified custodian preparing the statement.

Item 14 – Client Referrals and Other Compensation

Titan Retirement Advisors does not directly or indirectly compensate any person for client referrals.

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in *Item 5* of this Disclosure Brochure. Titan Retirement Advisors receives no other forms of compensation in connection with providing investment advice.

Titan Retirement Advisors does not directly or indirectly compensate anybody for client referrals.

Please see Item 5, Fees and Compensation, Item 10, Other Financial Industry Activities and Affiliations and Item 12, Brokerage Practices, for additional discussion concerning other compensation.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

Titan Retirement Advisors is deemed to have custody of client funds and securities whenever Titan Retirement Advisors is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody Titan Retirement Advisors will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which Titan Retirement Advisors is deemed to have custody, we have established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from Titan Retirement Advisors. When clients have questions about their account statements, they should contact Titan Retirement Advisors or the qualified custodian preparing the statement.

The advisory fee is calculated by the custodian and Titan Retirement Advisors is responsible for approving the calculation of fees. Upon approval by Titan Retirement Advisors, the custodian will deduct fees from Client accounts. Client's fees will be itemized in the account statement and will include the formula used to calculate the fee and the time period covered.

Item 16 – Investment Discretion

When providing asset management services, Titan Retirement Advisors maintains trading authorization over your Account and can provide management services on a **discretionary** basis. When discretionary authority is granted, we will have the authority to determine the type of securities and the amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction.

If you decide to grant trading authorization on a **non-discretionary** basis, we will be required to contact you prior to implementing changes in your account. Therefore, you will be contacted and required to accept or reject our investment recommendations including:

- The security being recommended
- The number of shares or units
- Whether to buy or sell

Once the above factors are agreed upon, we will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, you need to know that if we are not able to reach you or you are slow to respond to our request, it can have an adverse impact on the timing of trade implementations and we may not achieve the optimal trading price.

You will have the ability to place reasonable restrictions on the types of investments that may be purchased in your Account. You may also place reasonable limitations on the discretionary power granted to Titan Retirement Advisors so long as the limitations are specifically set forth or included as an attachment to the client agreement.

Item 17 – Voting Client Securities

Titan Retirement Advisors does not vote proxies on behalf of Clients. We have determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in Account.

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided. Although we do not vote client proxies, if you have a question about a particular proxy feel free to contact us. However, you will have the ultimate responsibility for making all proxy-voting decisions.

Item 18 – Financial Information

This *Item 18* is not applicable to this brochure. Titan Retirement Advisors does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, Titan Retirement Advisors has not been the subject of a bankruptcy petition at any time.

Customer Privacy Policy Notice

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to nonaffiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. Titan Retirement Advisors, LLC. does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law.

Titan Retirement Advisors, LLC. is committed to safeguarding the confidential information of its clients. Titan Retirement Advisors, LLC. holds all personal information provided by clients in the strictest confidence and it is the objective of Titan Retirement Advisors, LLC. to protect the privacy of all clients. Except as permitted or required by law, Titan Retirement Advisors, LLC. does not share confidential information about clients with nonaffiliated parties. In the event that there were to be a change in this policy, Titan Retirement Advisors, LLC. will provide clients with written notice and clients will be provided an opportunity to direct Titan Retirement Advisors, LLC. as to whether such disclosure is permissible.

To conduct regular business, Titan Retirement Advisors, LLC. may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to Titan Retirement Advisors, LLC.
- Information about the client's transactions implemented by Titan Retirement Advisors, LLC. or others
- Information developed as part of financial plans, analyses or investment advisory services

To administer, manage, service, and provide related services for client accounts, it is necessary for Titan Retirement Advisors, LLC. to provide access to customer information within the firm and to nonaffiliated companies with whom Titan Retirement Advisors, LLC. has entered into agreements with. To provide the utmost service, Titan Retirement Advisors, LLC. may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on Titan Retirement Advisors, LLC.'s behalf.

- Information Titan Retirement Advisors, LLC. receives from the client on applications (name, social security number, address, assets, etc.)
- Information about the client's transactions with Titan Retirement Advisors, LLC. or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions
- Information about a client's financial products and services transaction with Titan Retirement Advisors, LLC.

Since Titan Retirement Advisors, LLC. shares nonpublic information solely to service client accounts, Titan Retirement Advisors, LLC. does not disclose any nonpublic personal information about (Titan Retirement Advisors, LLC.'s customers or former customers to anyone, except as permitted by law. However, Titan Retirement Advisors, LLC. may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in

response to subpoenas. In the event that Titan Retirement Advisors, LLC. has a change to its customer privacy policy that would allow it to disclose non-public information not covered under applicable law, Titan Retirement Advisors, LLC. will allow its clients the opportunity to opt out of such disclosure.