

Twenty-First Tailored Solutions, Inc. Client Brochure

This brochure provides information about the qualifications and business practices of Twenty-First Tailored Solutions, Inc. If you have any questions about the contents of this brochure, please contact us at (914)589-6152 or by email at: rich@twenty-first.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 Twenty-First Tailored Solutions, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. Twenty-First Tailored Solutions, Inc.'s CRD number is: 158381

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Registration does not imply a certain level of skill or training.

Version Date: 01/22/2024

Item 2: Material Changes

There are no material changes in this brochure from the last annual updating amendment of Twenty-First Tailored Solutions. Inc. on 01/17/2023. Material changes relate to Twenty-First Tailored Solutions. Inc. policies, practices, or conflicts of interests only.

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Item 4: Advisory Business

A. Description of the Advisory Firm

Twenty-First Tailored Solutions, Inc. is a Corporation organized in the state of New York.

Twenty-First Tailored Solutions, Inc. was formed in June 2011, and the principal owner is Twenty-First Holdings, Inc. The Principal owners of Twenty-First Holdings, Inc. are Alexandra Gordon and Evan Gordon.

B. Types of Advisory Services

Twenty-First Tailored Solutions, Inc. (hereinafter "TFTS") no longer accepts new clients and offers the following services to existing advisory clients:

Investment Services

TFTS provides ongoing investment strategy services and regular portfolio monitoring services for its short against the box (SATB) portfolio of accounts.

C. Client Tailored Services and Client Imposed Restrictions

TFTS previously tailored a SATB strategy for each client. TFTS will make recommendations to clients whether to close part or all of the box positions based on material market, economic or political events, changes to the tax laws or changes in client's financial situation such as retirement, termination of employment, physical move, death or inheritance. Clients then decide whether to close part or all of the box positions.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. TFTS DOES NOT participate in any wrap fee programs.

E. Amounts Under Management

TFTS has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0.00	\$ 459,722,265	12/2023

Item 5: Fees and Compensation

A. Fee Schedule

Investment Services Fees

Total Assets Under Management	Annual Fee
All Assets Under Management	3.24 BPS – 52.5 BPS (0.0324% – 0.525%)

These fees were negotiated with each client on a case by case basis at the time each client account was established. The final fee schedule is described in the Investment Advisory Contract.

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid monthly in arrears.

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by TFTS. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

TFTS collects its fees in arrears and does not collect fees in advance.

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

TFTS does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

TFTS generally provides management supervisory services to the following types of clients:

- High-Net-Worth Individuals
- Corporations or Business Entities
- Advisors of High Net Worth Clients
- Trusts

Minimum Account Size

There is no account minimum.

Item 8: Method of Analysis, Investment Strategy, and Risk of Investment Loss

A. Methods of Analysis and Investment Strategies

TFTS implemented the Short Against the Box Strategy for each client based upon the goals of the client.

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

B. Material Risks Involved

The Short Against the Box Strategy involves the use of margin. If a margin call cannot be met, then a portion of the Box may need to be closed which could result in a capital gain to the account.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SR) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Richard Ainsberg is a registered representative of Crito Capital LLC.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither TFTS nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Clients should be aware that if they engage Mr. Ainsberg in his separate capacity as a registered representative of a broker-dealer, then he will receive a commission from the broker-dealer. This involves a conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Clients are in no way required to engage the separate brokerage services of Mr. Ainsberg in order to receive advisory services from TFTS.

D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

TFTS does not utilize nor select other advisors or third-party managers. All assets are managed by TFTS management.

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

A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

TFTS does not recommend that clients buy or sell any security in which TFTS or a related person to TFTS has a material financial interest.

Item 12: Brokerage Practices

The custodian, UBS Financial Services Inc., was chosen based on its relatively low fees. TFTS will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Richard Ainsberg periodically reviews client accounts at intervals set forth in the agreement with the client. This generally includes daily reviews related to margin calls, confirmation of funds or securities sent to the custodian; monthly reviews related to cash credits for short interest rebate, debits for interest expense, corporate actions; and annual reviews and reports related to 1099 statements.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Other than periodic reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, death, or inheritance).

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

TFTS does not receive any economic benefit, directly or indirectly from any third party for advice rendered to TFTS clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

TFTS does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

TFTS, with client written authority, has limited custody of client's assets because it directs the custodian to deduct its advisory fee from the client's account. Custody of all client assets and holdings is maintained at UBS Financial Services Inc. Clients will receive statements from UBS and they should carefully review those statements for accuracy. TFTS does not provide account statements to clients in addition to those provided by UBS.

Item 16: Investment Discretion

TFTS does not accept discretionary authority to manage client accounts. TFTS solely provides non-discretionary SATB investment advisory services to clients.

Item 17: Voting Client Securities (Proxy Voting)

TFTS will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should

direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

TFTS does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither TFTS nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

TFTS has not been the subject of a bankruptcy petition in the last ten years.