

Item 1 – Cover Page

Part 2A of Form ADV

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This Brochure provides information about the qualifications and business practices of Breakthru Advisory Services, LLC. If you have any questions about the contents of this Brochure, please contact us using the information listed above. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Breakthru Advisory Services, LLC (CRD# 332173) is a registered investment advisor with the SEC. Registration of an investment advisor does not imply any certain level of skill or training.

Additional information about Breakthru Advisory Services, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes

The following items have materially changed since the last brochure update:

- Item 4 – Update to the AUM

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## Item 4 – Advisory Business

### A. Description of the Advisory Firm

Breakthru was formed on May 13<sup>th</sup>, 2024 and is based in Muskego, Wisconsin. Breakthru's principal owner is Breakthrough Strategies Inc. which in turn is owned by Jerry Jendusa.

### B. Types of Advisory Services

#### ASSET MANAGEMENT

Breakthru offers asset management services to advisory Clients. Breakthru will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

#### Discretionary

When the Client elects to use Breakthru on a discretionary basis, the Client will sign a limited trading authorization or equivalent allowing Breakthru to determine the securities to be bought or sold and the amount of the securities to be bought or sold. Breakthru will have the authority to execute transactions in the account without seeking Client approval on each transaction.

Breakthru may also select and appoint one or more Sub-Advisor(s) to provide Sub-Advisor Services to a Client's Account. Such Sub-Advisor Services will be as determined by Breakthru. Such Sub-Advisor(s), in providing Sub-Advisor Services, shall have all of the same authority relating to the management, including fee deduction authority, of a Client's Account as is granted to Breakthru. In addition, at Breakthru's discretion, Breakthru may grant such Sub-Advisor(s) full authority to further delegate such discretionary investment authority to other investment advisors. Each Client will agree to such authority within Breakthru's Advisory Agreement. All fees paid by a Client to Breakthru are inclusive of the fees paid to Sub-Advisor.

#### FINANCIAL PLANNING AND CONSULTING

Financial planning and consulting services include an evaluation of a Client's current and future financial state using currently known variables to predict future cash flows, asset values, recommend purchase and sales, and withdrawal plans. Breakthru will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans. Topics for planning may include, but are not limited:

- Cash flow analysis: An income and spending plan determines how much can be set aside for debt repayment, savings and investing each month.
- Retirement strategy: A strategy for achieving retirement independent of other financial priorities, including a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- Long-term investment plan: Build a customized asset allocation strategy based on specific investment objectives and a risk profile. This strategy sets guidelines for selecting, buying and selling investments and establishing benchmarks for performance review.
- Tax reduction strategy: Identify ways to minimize taxes on personal income to the extent permissible by the tax code. The strategy should include identification of tax favored investment vehicles that can reduce taxation of investment income.

If a conflict of interest exists between the interests of Breakthru and the interests of the Client, the Client is under no obligation to act upon Breakthru's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through Breakthru.

C. Client-Tailored Services and Client-Imposed Restrictions

The Client's financial needs, investment goals, tolerance for risk, and investment objectives are documented in Breakthru's Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. These restrictions may, however, prohibit engagement with Breakthru.

D. Wrap Fee Programs

Breakthru does not participate or place any Client assets in any wrap fee program.

E. Amounts Under Management

As of the date of this brochure, Breakthru provides management services for:

Discretionary Assets:	Non-Discretionary Assets:
\$177,888,831	\$0

## Item 5 – Fees and Compensation

A. Fee Schedule

ASSET MANAGEMENT

Breakthru offers asset management services to advisory Clients. Breakthru charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Maximum Annual Fee
All Assets	1.50%

Fees are billed quarterly or monthly in advance or arrears (upon Client election) based on the amount of assets managed as of the close of business on the last business day of the previous billing period.

FINANCIAL PLANNING AND CONSULTING

Breakthru charges an hourly fee for financial planning and consulting. Prior to the planning process the Client will be provided an estimated plan fee which will be based on the complexity of the engagement. For hourly fee arrangements, services will be completed and delivered within six months contingent upon timely delivery of all required documentation.

HOURLY FEES

Hourly Fee Services are offered based on a maximum hourly fee of \$500 per hour. Fees for financial plans are billed upon completion of the plan. Breakthru reserves the right to waive all or part of the fee should the Client implement the plan through Breakthru.

B. Payment of Fees

Asset Management Fees are generally deducted directly from the Client's Account, paid by a third-party payor, invoiced directly to the Client, or paid by another method, in each case as agreed upon with the Client and outlined in the Client's Advisory Agreement with Breakthru.

Financial Planning and Consulting Fees are generally invoiced directly to the Client but may also be deducted from another account held with Breakthru.

Breakthru, in its sole discretion, may 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.).

For all services, Clients may terminate their engagement with Breakthru within five (5) business days of signing an Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the Advisory Agreement may be terminated by Breakthru with thirty (30) days written notice to Client and by the Client at any time with written notice to Breakthru. For accounts opened or closed mid-billing period, fees will be prorated based on the number of days for which services are provided during the given period. In the case of hourly engagements, fees will be prorated based on the work completed at the stated hourly rate. All unpaid earned fees will be due to Breakthru and all unearned fees will be refunded to the Client. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

C. Additional Fees

Custodians may charge brokerage commissions, transaction fees, and other related costs on the purchases or sales of mutual funds, equities, bonds, options, margin interest, and exchange-traded funds. Mutual funds, money market funds, and exchange-traded funds may also charge internal management fees, which are disclosed in the fund's prospectus. Breakthru does not directly receive any compensation from these fees. All of these fees are in addition to the management fee you pay to Breakthru. For more details on the brokerage practices, see Item 12 of this brochure.

D. Prepayment of Fees

If elected Clients may pay Asset Management fees in advance.

E. External Compensation for the Sale of Securities

Breakthru does not receive any external compensation from the sale of securities.

## **Item 6 - Performance-Based Fees and Side-By-Side Management**

Fees are not based on a share of the capital gains or capital appreciation of managed securities. Breakthru does not use a performance-based fee structure nor "side-by-side" management because of the conflict of interest. Performance based compensation may create an incentive for Breakthru to recommend an investment that may carry a higher degree of risk to the Client.

## **Item 7 – Types of Clients & Account Minimums**

Breakthru's Clients are generally individuals, trusts, estates, and high net-worth individuals. Client relationships vary in scope and length of service.

There is no minimum account size and Clients are not required to have a certain amount of investment experience or sophistication.

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

### **A. Methods of Analysis and Investment Strategies**

Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns. Breakthru's security analysis methods may include:

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

In developing a financial plan for a Client, Breakthru's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the SEC.

### **B. Investment Strategy**

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 by providing written notice to Breakthru. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

### **C. Risks of Investments and Strategies Utilized**

**Investing in securities involves risk of loss that Clients should be prepared to bear. Breakthru's investment approach keeps the risk of loss in mind. Investors may face the following investment risks:**

**General Investment and Trading Risks.** Clients may invest in securities and other financial instruments using strategies and investment techniques with significant risk characteristics. The investment program utilizes such investment techniques as option transactions, margin transactions, short sales, leverage, and derivatives trading, the use of which can, in certain circumstances, maximize the adverse impact to which a Client may be subject.

**General Market and Economic Risks.** The value of a Client's investments may decline due to changes in general economic and market conditions. This includes developments affecting

markets in general, such as political, regulatory, market or economic developments, or other developments that impact specific economic sectors, industries and segments of the market.

**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.

**Inflation Risk.** When any type of inflation is present, a dollar today will buy more than 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.

**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.

**Management Risk.** The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.

**Cybersecurity Risk.** Breakthru and its service providers may be subject to operational and information security risks resulting from cyberattacks. Cyberattacks include, among other behaviors, stealing or corrupting data maintained online or digitally, denial of service attacks on websites, the unauthorized release of confidential information or various other forms of cybersecurity breaches. Cybersecurity attacks affecting Breakthru and its service providers may adversely impact Clients. For instance, cyberattacks may interfere with the processing of transactions, cause the release of private information about Clients, impede trading, subject Breakthru to regulatory fines or financial losses, and cause reputational damage. Similar types of cybersecurity risks are also present for issuers of securities in which Clients may invest in, qualified custodians, governmental and other regulatory authorities, exchange and other financial market operators, or other financial institutions. Cybersecurity incidents that could ultimately cause them to incur losses, including for example: financial losses, cost and reputational damages, and loss from damage or interruption of systems. Although Breakthru has established its systems to reduce the risk of these incidents from coming to fruition, there is no guarantee that these efforts will always be successful, especially considering that Breakthru does not directly control the cybersecurity measures and policies employed by third party service providers.

**Exchange-Traded Funds.** ETFs are a type of index fund bought and sold on a securities exchange. The risks of owning an ETF generally reflect the risks of owning the underlying securities they are designed to track, although lack of liquidity in an ETF could result in it being more volatile and ETFs have management fees that increase their costs. ETFs are also subject to other risks, including: (i) the risk that their prices may not correlate perfectly with changes in the underlying reference units; and (ii) the risk of possible trading halts due to market conditions or other reasons that, in the view of the exchange upon which an ETF trades, would make trading in the ETF inadvisable.



**Mutual Fund Risks.** An investment in mutual funds could lose money over short or even long periods. A mutual fund's share price and total return are expected to fluctuate within a wide range, like the fluctuations of the overall stock market.

**Common Stocks and Equity-Related Securities.** Certain ETFs or mutual funds hold common stock. Prices of common stock react to the economic condition of the company that issued the security, industry and market conditions, and other factors which may fluctuate widely. Investments related to the value of stocks may rise and fall based on an issuer's actual and anticipated earnings, changes in management, the potential for takeovers and acquisitions, and other economic factors. Similarly, the value of other equity-related securities, including preferred stock, warrants, and options may also vary widely.

The foregoing list of risk factors does not purport to be a complete enumeration or explanation of the risks involved in an investment with Breakthru.

## Item 9 – Disciplinary Information

Neither Breakthru nor any of its management persons have been involved in any criminal or civil actions, administrative or self-regulatory enforcement proceedings, nor any legal or disciplinary events that are material to a Client's or prospective Client's evaluation of Breakthru or the integrity of its management.

## Item 10 – Other Financial Industry Activities and Affiliations

### A. Registration as a Broker-Dealer or Broker-Dealer Representative

Neither Breakthru nor its management persons are registered as a broker-dealer or a registered representative of a broker-dealer.

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

Neither Breakthru nor any of its management persons are registered as futures commission merchant, commodity pool operator, or a commodity trading advisor.

### C. Relationships Material to this Advisory Business and Possible Conflicts of Interest

Both of the Investment Adviser Representatives of Breakthru receive external compensation from sales of investment related services as Insurance Agents. This represents a conflict of interest because it gives an incentive to recommend services based on the fee amount received. This conflict is mitigated by disclosures, procedures and Breakthru's fiduciary obligation to place the best interest of the Client first. Moreover, Clients are not required to engage any Investment Adviser Representative of Breakthru as an Insurance Agent if they do not wish to. More information on this can be found in the respective Investment Adviser Representative's Form U4 and Form ADV 2B.

### D. Selection of Other Advisors or Managers

Breakthru may select and appoint one or more Sub-Advisor(s) to provide Sub-Advisor Services to Client Accounts. When selecting Sub-Advisors, the Client's best interest will be the main determining factor of Breakthru. Breakthru ensures that before selecting other Sub-Advisors that they are properly licensed or registered as an investment advisor.

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

### A. Code of Ethics

The supervised persons (supervised persons include employees and/or independent contractors) of Breakthru have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of Breakthru supervised persons and addresses conflicts that may arise. The Code defines acceptable behavior for supervised persons of Breakthru. The Code reflects Breakthru and its supervised persons’ responsibility to act in the best interest of their Client.

One area which the Code addresses is when supervised persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any supervised persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Breakthru’s policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other supervised person, officer or director of Breakthru may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Breakthru’s Code is based on the guiding principle that the interests of the Client are our top priority. Breakthru’s officers, directors, advisors, and other supervised persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client’s interests over the interests of either supervised persons or Breakthru.

Certain parts of this Code apply to “access” persons. “Access” persons are supervised persons who have access to non-public information regarding any Clients’ purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

Breakthru will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

### B. Recommendations Involving Material Financial Interests

Neither Breakthru nor its related persons recommend to Clients, or buys or sells for Client accounts, securities in which Breakthru or a related person has a material financial interest.

### C. Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Breakthru and its affiliated persons may invest in the same securities (or related securities, e.g., warrants, options or futures) that Breakthru or an affiliated person recommends to Clients. In order to mitigate conflicts of interest, such as frontrunning, Breakthru’s Chief Compliance Officer, or their designee, will no less than quarterly, review firm and/or personal holdings of its affiliated persons.

These reviews ensure that the personal trading of affiliated persons does not disadvantage Clients of Breakthru.

D. Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

Breakthru and its affiliated persons may recommend securities, or buy or sell securities for Clients accounts, at or about the same time, that they also buy or sell the same securities in their own account(s). Breakthru, for instance, will place trades in an account in an attempt to earn better than money market rates. In order to mitigate conflicts of interest, such as frontrunning, Breakthru's Chief Compliance Officer, or their designee, will no less than quarterly, review firm and/or personal holdings of its affiliated persons. These reviews ensure that the personal trading of affiliated persons does not disadvantage Clients of Breakthru.

## Item 12 – Brokerage Practices

A. Factors Used to Select or Recommending Broker-Dealers

Breakthru does not maintain custody of your assets, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend that our Clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer and a member of SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we or you instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. Conflicts of interest associated with this arrangement are described below as well as in Item 14 (Client Referrals and Other Compensation). You should consider these conflicts of interest when selecting your custodian.

We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Schwab, then we cannot manage your account. Not all advisors require their Clients to use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at Schwab, and we anticipate that most trades will be executed through Schwab, we can still use other broker-dealers to execute trades for your account.

We seek to recommend Schwab, a custodian/broker that will hold your assets and execute transactions. When considering whether the terms that Schwab provides are, overall, most advantageous to you when compared with other available providers and their services, we take into account a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, ETFs, etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services

- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to us and our Clients
- Services delivered or paid for by Schwab
- Availability of other products and services that benefit us, as discussed below (see “Products and services available to us from Schwab”)

For our Clients’ accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab’s Cash Features Program. In addition to commissions or transaction fees, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

We are not required to select the broker-dealer that charges the lowest transaction cost, even if that broker-dealer provides execution quality comparable to other broker-dealers. Although we are not required to execute all trades through Schwab, we have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above. By using another broker-dealer you may pay lower transaction costs.

Schwab Advisor Services™ is Schwab’s business serving independent investment advisory firms like us. They provide us and our Clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us. Schwab also makes available various support services. Some of those services help us manage or administer our Clients’ accounts, while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of Schwab’s support services.

Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our Clients. Schwab’s services described in this paragraph generally benefit you and your account.

Schwab also makes available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our Clients’ accounts and operating our firm. They include investment research, both Schwab’s own and that of third parties. We use this research to service all or a substantial number of our Clients’

accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our Clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology and business needs
- Consulting on legal and related compliance needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Schwab provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. Schwab also provides us with other benefits, such as occasional business entertainment of our personnel. If you did not maintain your account with Schwab, we would be required to pay for these services from our own resources. The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The fact that we receive these benefits from Schwab is an incentive for us to recommend the use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. In some cases, the services that Schwab pays for are provided by an affiliate of ours or by another party that has some pecuniary, financial or other interests in us (or in which we have such an interest). This creates an additional conflict of interest. We believe, however, that taken in the aggregate, our recommendation of Schwab as custodian and broker is in the best interests of our Clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services and not Schwab's services that benefit only us.

1. Research and Other Soft Dollar Benefits  
Breakthru does not receive research or other soft dollar benefits.
2. Brokerage for Client Referrals  
Breakthru does not receive Client referrals from any custodian or third party in exchange for using that broker-dealer or third party.
3. Directed Brokerage  
Breakthru does not generally accept directed brokerage arrangements (when a Client requires that account transactions be effected through a specific broker-

dealer). However, Breakthru does allow for Client directed brokerage in certain situations. Such situations may affect Breakthru's ability to negotiate commissions with the resulting inability to obtain volume discounts or best execution for Client directed accounts in some transactions. Therefore, a Client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case should the Client elect to trade through the broker-dealer Breakthru recommends.

Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker-dealer involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to affect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker-dealer and the financial strength and stability of the broker-dealer. The firm does not receive any portion of the trading fees.

B. Aggregating Trading for Multiple Client Accounts

When a Client authorizes discretionary management, Breakthru is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of Breakthru. All Clients participating in the aggregated order shall receive an average share price with all other transactions. If aggregation is not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-late trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred. Breakthru will always attempt to aggregate orders whenever it has the opportunity to do so.

### Item 13 – Review of Accounts

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

Account reviews are performed at least annually by the Chief Compliance Officer of Breakthru. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of a Client's documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Financial plans are updated as requested by the Client and pursuant to a new or amended agreement, Breakthru suggests updating at least annually.

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

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

C. Content and Frequency of Regular Reports

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the Client's custodian. Client receives confirmations of each transaction

in account from Custodian and an additional statement during any month in which a transaction occurs. Breakthru may also send periodic or other event-inspired reports based on market or portfolio activity. Reports will generally be provided in electronic format.

#### Item 14 – Client Referrals and Other Compensation

A. Economic Benefits from Others

Breakthru receives an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. You do not pay more for assets maintained at Schwab as a result of these arrangements. However, we benefit from the referral arrangement because the cost of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices).

B. Compensation to Non-Advisory Personnel for Client Referrals

Breakthru does not compensate for Client referrals.

#### Item 15 – Custody

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by Breakthru.

Breakthru is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of Breakthru. Breakthru will obtain written authorization from Client to allow for such deductions.

Breakthru also has custody of funds and/or securities in certain Client accounts. These accounts are examined on a surprise basis at least annually by an outside public accounting firm unless otherwise exempted.

Breakthru is not affiliated with any custodian. No custodian supervises Breakthru, its employees or activities.

#### Item 16 – Investment Discretion

If applicable, a Client will authorize Breakthru discretionary authority, via the Advisory Agreement, 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. If applicable, a Client will authorize Breakthru discretionary authority to execute selected investment program transactions as stated within the Advisory Agreement. If however, consent for discretion is not given, Breakthru will obtain prior Client approval before executing each transaction.

Breakthru allows Clients to place certain restrictions on investments. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to Breakthru in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. Breakthru does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

### Item 17 – Voting Client Securities

Clients will receive proxy voting information directly from the issuer and/or custodian of the security. Clients will not receive any such proxy voting material from Breakthru. When assistance on voting proxies is requested by the Client, Breakthru will provide recommendations to the Client. However, Breakthru will not have authority to vote proxies on behalf of the Client. If in the future Breakthru obtains authority to vote proxies, this Brochure will be appropriately amended. Clients may contact Breakthru regarding any proxy solicitation at 262-977-9907 or [info@breakthruadvisoryservices.com](mailto:info@breakthruadvisoryservices.com).

### Item 18 – Financial Information

#### A. Balance Sheet

Breakthru does not require nor solicit prepayment of more than \$1,200 in fees per Client, six months or more in advance.

#### B. Financial Condition

At this time, neither Breakthru nor its management persons have any financial conditions that are likely to reasonably impair its ability to meet contractual commitments to Clients.

#### C. Bankruptcy Petitions in Previous Years

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



SUPERVISED PERSON BROCHURE  
Part 2B of Form ADV

Breakthru Advisory Services, LLC

W160S6550 Commerce Dr.  
Suite 210  
Muskego, WI 53150  
Phone: 262-977-9907  
[www.breakthruadvisoryservices.com](http://www.breakthruadvisoryservices.com)

[tomd@realbreakthru.com](mailto:tomd@realbreakthru.com)

October 23<sup>rd</sup>, 2024

This brochure supplement provides information about Tom Deppe and supplements the Breakthru Advisory Services, LLC brochure. You should have received a copy of that brochure. Please contact Tom Deppe if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Tom Deppe (CRD# 5121635) is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Supervised Person Brochure - Tom Deppe

Year of birth: 1965

### Item 2 - Educational Background and Business Experience

Educational Background:

- University of Hawaii, Bachelors in Psychology, 1990
- Concordia University, Master of Educational Counseling 2004

Business Experience:

- Breakthru Advisory Services, LLC; President and Investment Advisor Representative; 06/2024 – Present
- Breakthru Financial Services LLC; Tax Preparer/Insurance Agent; 06/2024 – Present
- Osaic Wealth, Inc.; Investment Advisor Representative/Registered Representative; 01/2024 – 06/2024
- Woodbury Financial Services, Inc.; Investment Advisor Representative; 01/2011 – 01/2024
- Woodbury Financial Services, Inc.; Registered Representative; 07/2010 – 01/2024

### Item 3 - Disciplinary Information

*Criminal or Civil Action:* None to report

*Administrative Proceeding:* None to report

*Self-Regulatory Proceeding:* None to report

### Item 4 - Other Business Activities Engaged In

Tom Deppe has outside business activities as follows:

- Licensed Insurance Agent
- Tax Preparer

Approximately 20% of their time is spent on the above practices and from time to time, may offer Clients services from these activities. These practices represent conflicts of interest because they give Tom Deppe an incentive to recommend products and or services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures and Breakthru's fiduciary obligation to place the best interest of the Client first. Moreover, Clients are not required to purchase or engage Tom Deppe for any products or services offered as Clients have the option to purchase them through another person or entity of their choosing.

### Item 5 - Additional Compensation

Tom Deppe receives commissions on insurance and tax preparation sales but does not receive any performance-based fees. He does not receive any additional compensation for performing advisory services other than what is disclosed in Item 4 of Part 2A.

### Item 6 - Supervision

The Chief Compliance Officer of Breakthru supervises and monitors the advisory services of Tom Deppe. The Chief Compliance Officer, Sarah Kopesky can be reached at [sarahk@realbreakthru.com](mailto:sarahk@realbreakthru.com).

SUPERVISED PERSON BROCHURE  
Part 2B of Form ADV

Breakthru Advisory Services, LLC

W160S6550 Commerce Dr.  
Suite 210  
Muskego, WI 53150  
Phone: 262-977-9907  
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[sarahk@realbreakthru.com](mailto:sarahk@realbreakthru.com)

October 23<sup>rd</sup>, 2024

This brochure supplement provides information about Sarah Kopesky and supplements the Breakthru Advisory Services, LLC brochure. You should have received a copy of that brochure. Please contact Sarah Kopesky if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Sarah Kopesky (CRD# 6558816) is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Supervised Person Brochure - Sarah Kopesky

Year of birth: 1978

### Item 2 - Educational Background and Business Experience

Educational Background:

- University of Wisconsin, Bachelors in History & Journalism, 2001
- Cardinal Stritch University, Teacher Certification and Masters in Education, 2006

Business Experience:

- Breakthru Advisory Services, LLC; Investment Advisor Representative; 06/2024 – Present
- K2 Financial LLC; Tax Preparer/Insurance Agent; 10/2023 – Present
- Osaic Wealth, Inc.; Investment Advisor Representative/Registered Representative; 01/2024 – 06/2024
- Woodbury Financial Services, Inc.; Registered Representative; 12/2015 – 01/2024
- Woodbury Financial Services, Inc.; Investment Advisor Representative; 07/2016 – 01/2024
- Wauwatosa School District; Teacher; 08/2004 – 07/2015

### Item 3 - Disciplinary Information

*Criminal or Civil Action:* None to report

*Administrative Proceeding:* None to report

*Self-Regulatory Proceeding:* None to report

### Item 4 - Other Business Activities Engaged In

Sarah Kopesky has outside business activities as follows:

- Licensed Insurance Agent
- Tax Preparer

Approximately 20% of their time is spent on the above practices and from time to time, may offer Clients services from these activities. These practices represent conflicts of interest because they give Sarah Kopesky an incentive to recommend products and or services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures and Breakthru's fiduciary obligation to place the best interest of the Client first. Moreover, Clients are not required to purchase or engage Sarah Kopesky for any products or services offered as Clients have the option to purchase them through another person or entity of their choosing.

### Item 5 - Additional Compensation

Sarah Kopesky receives commissions on insurance and tax preparation sales but does not receive any performance-based fees. She does not receive any additional compensation for performing advisory services other than what is disclosed in Item 4 of Part 2A.

### Item 6 - Supervision

The President of Breakthru supervises and monitors the advisory services of Sarah Kopesky. The President, Tom Deppe, can be reached at [tomd@realbreakthru.com](mailto:tomd@realbreakthru.com).