

**Item 1 – Cover Page**

**Part 2A of Form ADV  
Brochure for:**

# TIFIN Give

**TIFIN Give Inc.**

**2440 Junction Place, Suite 300  
Boulder CO 80301  
Phone: (800) 807-4066  
Email: [hello@tifingive.com](mailto:hello@tifingive.com)  
<https://tifingive.com/>**

**March 29, 2024**

**This Brochure provides information about the qualifications and business practices of TIFIN Give Inc. (“TIFIN Give”). If you have any questions about the contents of this Brochure, please contact TIFIN Give at the phone number and/or email 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.**

**TIFIN Give is a registered investment adviser with the SEC. Registration as an investment adviser does not imply any certain level of skill or training.**

**Additional information about TIFIN Give is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2 – Material Changes**

On March 31, 2023, we filed the previous annual updating amendment to the ADV Part 2A (“Brochure”). The following material changes have been made since the Brochure was filed:

- Item 4: Updates to reflect to TIFIN Give’s legal name change and change in corporate form

In addition, certain non-material changes have also been made to this Brochure. Consequently, we encourage you to read this Brochure in its entirety.

### Item 3 – Table of Contents

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

## Item 4 – Advisory Business

### A. Description of the Advisory Firm

Louise Giving Technologies, LLC (d/b/a TIFIN Give), , was formed on June 25, 2020. On November 27, 202, Louise Giving Technologies, LLC converted to a corporate form, as TIFIN Give Inc. (“TIFIN Give”) pursuant to section 265 of The Delaware General Corporation Law. TIFIN Give is registered with the United States Securities and Exchange Commission (“SEC”) under Rule 203A-2(e) of the Investment Advisers Act of 1940, as amended (the “Advisers Act”), and therefore conducts business solely through a proprietary web-based advisory platform (the “Platform”). TIFIN Group LLC (“TIFIN”) owns TIFIN Give. Dr. Vinay Nair is the Chief Executive Officer of TIFIN.

### B. Types of Advisory Services

TIFIN Give provides advisory services to the 501(c)(3) sponsors (“DAF Sponsor” or “Client”) of donor-advised funds (“DAFs”). The individual or entity (“Donor”) which establishes the DAF with the DAF Sponsor may choose to designate their own investment adviser (each, a “DAF Adviser”).

TIFIN Give’s Platform is designed for supporting philanthropy by offering DAF Sponsor approved investment model portfolios (hereinafter defined) which allow a DAF to align its investment portfolio (or a portion thereof) with the values that drive the DAF’s charitable giving. TIFIN Give’s Platform helps facilitate charitable giving for DAFs by streamlining the identification of, and donation to, various 501(c)(3) charities. It is up to the DAF Adviser or the Donor to review and select what charities they would like to allocate the DAF’s charitable gifts towards.

The Platform provides services in two ways: (1) offering a model marketplace of DAF Sponsor approved core investment models; including the ability for DAF Adviser to upload custom models which fall within the approval guidelines of DAF Sponsor and (2) TIFIN Give has developed cause - specific thematic investment models used to personalize the DAF investment allocations to reflect the DAF’s unique charitable goals (each defined as a Model Portfolio and collectively referred to as “Model Portfolios”). TIFIN Give does not consider any other data in furnishing investment recommendations. Users of the website, including DAF Advisers, must make their own suitability and risk determinations in light of their knowledge of the Donor and the Donor’s charitable giving aims. Through its Clients, TIFIN Give seeks to enable DAFs to offer personalized investment options and/or advice regarding Model Portfolios that align with their charitable goals.

Clients grant DAF Advisers or other DAF representatives’ access to the Platform to (1) recommend suitable core investment models for their associated DAF, to include cause-specific investment models exposure and (2) generate charitable giving profiles for their associated DAF.

TIFIN Give assists Clients in offering approved investment models and trading execution of the approved models.

TIFIN Give may enter into partnerships with and receive sponsorship fees from third party fund managers (“Fund Sponsors”). Under these arrangements, Fund Sponsors of Model Portfolios (“Sponsored Funds”) pay TIFIN Give sponsorship fees in order to enhance the visibility of their Sponsored Funds on TIFIN Give’s platform.

As an internet adviser, TIFIN Give provides its investment advisory services to Clients solely through its website (available at <https://app.meetlouis.com/auth>). Clients direct DAF Advisers or other DAF representatives to the website.

C. Client-Tailored Services and Client-Imposed Restrictions

Advisory services are tailored to assist Client's in achieving each DAF's charitable giving objectives and other aims identified by the Client or DAF Adviser. TIFIN Give currently offers investment recommendations only with respect to Model Portfolios, but may in the future provide investment recommendations of other types of securities.

D. Wrap Fee Programs

TIFIN Give does not participate in wrap fee programs.

E. Amounts Under Management

TIFIN Give has the following assets under management as of 12/31/2023:

<b>Discretionary Amounts:</b>	<b>Non-Discretionary Amounts:</b>	<b>Total Firm Assets:</b>
\$2,712,668.66	0	\$2,712,668.66

## **Item 5 – Fees and Compensation**

A. Fee Schedule

The fees and compensation payable to TIFIN Give, and the timing of their payment, are negotiable and vary among its Clients depending on the nature of the services that the Client receives from TIFIN Give and in accordance with the Client agreement. Clients with account balances less than or equal to \$1,000,000 will be subject to a Technology and Services Fee ("Service Fee") that is billed to the Client on a monthly basis calculated daily based on the asset value of the DAF account. The Service Fees are generally 30 basis points per annum calculated daily based on the asset value of the DAF account. Clients will also be subject to an investment management fee (the "Management Fee") in exchange for investment management and trade execution services that is billed to the Client on a monthly basis. Management Fees are generally 10 basis points per annum calculated daily based on the asset value of the DAF accounts. Clients with account balances more than \$1,000,000 will be subject to a Service Fee that is billed to the Client on a monthly basis calculated daily based on the asset value of the DAF account. The Service Fees are generally 10 basis points per annum calculated daily based on the asset value of the DAF account. Clients will also be subject to a Management Fee in exchange for investment management and trade execution services that is billed to the Client on a monthly basis. Management Fees are generally 3.34 basis points per annum calculated daily based on the asset value of the DAF accounts.

Clients will also be subject to a sub-advisory fee (the "Sub-Advisory Fee") which is paid to the DAF Adviser and is billed to the Client on a monthly basis. Sub-Advisory Fees generally range from 0-100 basis points per annum billed to the Client on a monthly basis calculated daily based on the asset value of the DAF account.

TIFIN Give does not currently receive any incentive-based compensation from Clients. TIFIN Give's compensation is negotiable, and TIFIN Give may, in its sole discretion, elect to waive or modify any fee or compensation with respect to any Client, without entitling any other Client to a waiver or modification.

Investment recommendations may include Sponsored Funds for which TIFIN Give or an affiliate of TIFIN Give serves as a marketer pursuant to compensated sponsorship arrangements. TIFIN Give has conflicts of interest when providing its services to Clients by recommending Sponsored Funds for which the Firm or its affiliate(s) receive fees and/or compensation.

B. Payment of Fees

Fees are billed to each Client's account on a monthly basis calculated at the end of each month based on the daily asset value of the DAF account during the period.

C. Fees and Expenses

TIFIN Give's fees are exclusive of brokerage commissions, transaction fees and other related costs and expenses which shall be incurred by the Clients. TIFIN Give's fees do not include any custodial or brokerage expenses that a Client's custodian or broker may charge. Clients will typically pay transaction and/or custodial expenses in connection with implementing any of TIFIN Give's recommendations. These transaction and/or custodial expenses vary and are based on the Client's agreement with their account custodian and/or broker-dealer.

Fees paid to TIFIN Give for investment advisory services are separate and distinct from the fees and expenses charged by the ETFs and/or mutual funds in which a Client's assets are invested. The ETFs and/or mutual funds charge their own separate management fees and bear other expenses, as described in each fund's prospectus. TIFIN Give does not earn or receive a portion of such fees.

Model Portfolios may include Sponsored Funds for which an affiliate of TIFIN Give serves as a marketer pursuant to compensated sponsorship arrangements. TIFIN Give has conflicts of interest when providing its services to Clients by recommending Sponsored Funds for which TIFIN or its affiliate(s) receive fees and/or compensation.

D. Prepayment of Fees

TIFIN Give does not expect Clients to prepay fees.

E. Outside Compensation for the Sale of Securities

Neither TIFIN Give nor its supervised persons accept compensation for the sale of securities or other securities outside of its association with TIFIN Give.

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

As discussed in Item 5.A., TIFIN Give does not currently receive an incentive fee from its Clients.

## **Item 7 – Types of Clients**

TIFIN Give's Clients are DAF sponsors. Through its Platform, TIFIN Give provides investment advisory services with respect to charitable assets that have been allocated to DAFs by Donors. TIFIN Give provides advice to the DAF sponsor through recommendations and/or advice regarding Model Portfolios.

Following regulations regarding charitable contributions set forth in the Internal Revenue Code of 1986, as amended, contributions to DAFs become the sole property of the applicable DAF sponsor. All DAF contributions are both irrevocable and unconditional. Once contributions are accepted, they are not refundable and become assets owned and held by the DAF sponsor and are subject to the exclusive legal authority and control of the DAF sponsor as to their use and distribution. Thus, TIFIN Give's clients are DAF sponsors, not the DAFs themselves or the donors.

TIFIN Give does not impose a minimum account size. Clients are not required to have a certain amount of investment experience or sophistication. Generally, similar terms will apply to Clients, though certain Clients may have terms that differ or are more favorable than those for other Clients.

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

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

As described in Items 4 and 7, TIFIN Give provides Clients with investment recommendations using the Platform. The Platform uses data about the DAF's or Donor's charitable giving to various charities listed on the Platform to develop personalized profiles and recommend investments composed of Model Portfolios. TIFIN Give-generated recommendations seek to align the DAF's investment portfolio with its or its Donor's historical charitable giving and any other information provided by the Donor or DAF Adviser. Investment recommendations may be reviewed by the DAF Adviser as set forth in each DAF Adviser's separate sub-advisory agreement.

TIFIN Give uses its proprietary software to create personalized charitable profiles for the DAFs on behalf of Clients and to recommend investments based on algorithms that correspond to such charitable profiles. In making these recommendations, TIFIN Give's software considers the information that the Client has provided and that a DAF Adviser or Donor has provided through TIFIN Give's website based on their responses to the profile questionnaire and charitable giving history. The Clients can create an Investment Policy Statement of acceptable investment recommendations in partnership with TIFIN Give.

Clients should be aware that:

- TIFIN Give uses its proprietary software to generate investment recommendations.
- These recommendations may evolve and allocations may be rebalanced over time to reflect changes to the DAF's or Donor's charitable giving profile.
- The aim of the Platform is to generate Investment Product recommendations that align with observed charitable giving patterns, not to make recommendations designed to yield the

highest investment returns. The proprietary algorithm takes into account a variety of DAF- and market-specific factors and conditions.

- There will be no human intervention in decision-making. The Platform is systematic, and rules based.
- In making investment recommendations, TIFIN Give's software considers the information that the Client has provided and that a DAF Adviser or Donor has provided through the Platform via responses to the profile questionnaire and charitable giving history. TIFIN Give does not use any other information about the Client, DAF or Donor, such as other investments or risk tolerances to make recommendations.

## B. Investment Tools

TIFIN Give recommends Model Portfolios and proposes allocation amounts based on the DAF's overall profile size and charitable giving to charities via TIFIN Give. Through the Platform, TIFIN Give will place orders for the Model Portfolios within the Client's custodial account.

## C. Risks of Investments and Strategies Utilized

**Investing in securities, including ETFs and Model Portfolios, involves risk of loss that Clients should be prepared to bear.**

Investment and trading risk factors may include:

**General Investment and Trading Risks.** Clients may invest in securities and other financial instruments using strategies and investment techniques with significant risk characteristics.

**Focus on Charitable Goals, Not Investment Returns.** TIFIN Give's recommendations are designed to align a DAF's charitable giving with Model Portfolios that reflect the same or similar goals or industries. TIFIN Give's recommendations are not intended to be, nor are they expected to be, profit maximizing. As a result, DAFs implementing TIFIN Give recommendations may forego potentially lucrative investment opportunities to the extent TIFIN Give does not recommend such investments because the algorithm determines such investments are inconsistent with the DAF's charitable aims. Thus, a DAF's performance may be lower than other DAFs or accounts whose investment strategies are not subject to such considerations. There is of course no assurance that TIFIN Give's recommendations will result in, or contribute to, the achievement of any particular charitable goals.

**Technology and Software Risks.** TIFIN Give delivers its investment advisory services primarily through software accessible through TIFIN Give's website. All investment advice is provided through the internet and Clients' abilities to interact with humans regarding investment advice is accordingly limited. Additionally, such computer-generated recommendations, like all investment recommendations, may be subject to system error. No guarantee or representation is being made that the investment recommendations will be successful.

TIFIN Give rigorously designs, develops, and tests its software extensively before putting such software into production with actual Clients and periodically monitors the behaviors of such software after its deployment. Notwithstanding this rigorous design, development, testing and monitoring, it is possible that such software may not always perform exactly as was intended. Technology and software malfunctions, programming inaccuracies, inadvertent system and human



errors and similar circumstances could impair the performance of TIFIN Give's systems, which may negatively impact the quality and applicability of TIFIN Give's recommendations to Clients.

**Fund Managers' Sponsored Results.** TIFIN Give allows Fund Managers to participate in paid sponsorships resulting in such Fund Managers' products being presented to Clients first when searching for investment recommendations. Sponsored recommendations are identified as "Sponsored" in the search results. Such sponsorship does not imply that any such sponsored results are more appropriate for Clients as compared to results presented after the sponsored results, only that such Fund Managers have paid for premium placement. Each Client is strongly encouraged to conduct its own analysis and to consider its own individual circumstances, risk tolerances and needs prior to following any of TIFIN Give's recommendations.

**Exchange Traded Funds.** ETFs represent shares of ownership in either funds or unit investment trusts that hold portfolios of common stocks, bonds or other instruments, which are designed to generally correspond to the price and yield performance of an underlying index. A primary risk relating to ETFs is that the general level of stock or bond prices may decline, thus affecting the value of an equity or fixed income ETF, respectively. An ETF may also be adversely affected by the performance of the specific sector or group of industries on which it is based. Moreover, although ETFs are designed to provide investment results that generally correspond to the price and yield performance of their underlying indices, ETFs may not replicate the performance of the indices because of various sources of tracking error, including the expenses associated with ETFs and a number of other factors.

**Common Stocks and Equity-Related Securities.** ETFs or model portfolios may invest in the common stock of a variety of companies. 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.

**Small- and Mid-Cap Risks.** Certain ETFs or model portfolios may hold securities of small and mid-cap issuers. Securities of small-cap issuers may present greater risks than those of large-cap issuers. For example, some small- and mid-cap issuers often have limited product lines, markets, or financial resources. They may be subject to high volatility in revenues, expenses, and earnings. Their securities may be thinly traded, may be followed by fewer investment research analysts, and may be subject to wider price swings and thus may create a greater chance of loss than when investing in securities of larger-cap issuers. The market prices of securities of small- and mid-cap issuers generally are more sensitive to changes in earnings expectations, to corporate developments, and to market rumors than are the market prices of large-cap issuers.

**Futures, Commodities, and Derivative Investments.** Certain ETFs hold commodities, commodities contracts, and/or derivative instruments, including futures, options and swap agreements. The prices of commodities contracts and derivative instruments, including futures and options, are highly volatile. Payments made pursuant to swap agreements may also be highly volatile. Price movements of commodities, futures and options contracts, and payments pursuant to swap agreements are influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. The value of futures, options, and swap agreements also depends upon the price of the commodities underlying them. In addition, client

assets are subject to the risk of the failure of any of the exchanges on which its positions trade or of its clearinghouses or counterparties.

**Highly Volatile Markets.** The prices of financial instruments can be highly volatile. Price movements of forward and other derivative contracts are influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. Clients are also subject to the risk of failure of any of the exchanges on which DAF positions trade or of its clearinghouses.

**Non-U.S. Securities.** Certain ETFs may hold securities of non-U.S. issuers. Investments in securities of non-U.S. issuers pose a range of potential risks which could include expropriation, confiscatory taxation, imposition of withholding or other taxes on dividends, interest, capital gains or other income, political or social instability, illiquidity, price volatility, and market manipulation. In addition, less information may be available regarding securities of non-U.S. issuers, and non-U.S. issuers may not be subject to accounting, auditing and financial reporting standards, and requirements comparable to or as uniform as those of U.S. issuers.

**Emerging Markets.** Certain ETFs may hold securities of emerging market issues. In addition to the risks associated with investments outside of the United States, investments in emerging markets (i.e., the developing countries) may involve additional risks. Emerging markets generally are not as efficient as those in developed countries. In some cases, a market for the security may not exist locally, and transactions will need to be made on a neighboring exchange. Volume and liquidity levels in emerging markets are lower than in developed countries. When seeking to sell emerging market securities, little or no market may exist for the securities. In addition, issuers based in emerging markets are not generally subject to uniform accounting and financial reporting standards, practices, and requirements comparable to those applicable to issuers based in developed countries, thereby potentially increasing the risk of fraud or other deceptive practices.

**Cybersecurity.** Intentional cybersecurity breaches include unauthorized access to systems, networks, or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow, or disrupt operations, processes, or website access or functionality. In addition, unintentional incidents can occur, such as the inadvertent release of confidential information (possibly resulting in the violation of applicable privacy laws). A cybersecurity breach could result in the loss or theft of customer data or funds, the inability to access electronic systems (“denial of services”), loss or theft of proprietary information or corporate data, physical damage to a computer or network system, or costs associated with system repairs. Such incidents could cause an investment fund, the advisor, a manager, or other service providers to incur regulatory penalties, reputational damage, additional compliance costs, or financial loss. TIFIN Give takes measures to protect sensitive client information and service disruptions, among other things, through cybersecurity preparedness and business continuity plans from intentional and unintentional cybersecurity threats.

**Algorithmic Advice.** The identification of Model Portfolios and allocations consistent with a DAF’s charitable giving and other identified goals is difficult and involves a significant degree of uncertainty. The likelihood of identifying Model Portfolios that fully align with a DAF’s charitable giving or identified goals is not assured and is dependent on inputs provided by external sources, including the DAF as well as the availability of Model Portfolios that invest thematically in areas that align with the DAF’s charitable giving.

**The foregoing list of risk factors does not purport to be a complete enumeration or explanation of the risks involved in an investment with TIFIN Give. Prospective Clients should read the entire Brochure as well as any other materials that may be provided by TIFIN Give, and consult with their own advisers prior to engaging TIFIN Give's services.**

### **Item 9 – Disciplinary Information**

TIFIN Give and its management persons have not been a party to any legal or disciplinary events that would be material to a client's or prospective client's evaluation of its investment advisory business or the integrity of its management.

### **Item 10 – Other Financial Industry Activities and Affiliations**

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

TIFIN Give is not registered as a broker-dealer nor are its employees broker-dealer representatives. Two affiliated companies under common control with TIFIN Give are registered as broker-dealers, TIFIN Private Markets LLC and TIFIN Distribution Partners LLC. TIFIN Private Markets LLC and TIFIN Distribution Partners LLC do not currently have material business relationships with TIFIN Give, however, executive or management personnel of each entity are also executives of TIFIN Give's parent company. TIFIN Distribution Partners LLC may in the future receive compensation from sponsorships or revenue sharing with sponsors of investment models that may be recommended on the Platform.

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

Neither TIFIN Give nor 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**

TIFIN Give's principal owner, TIFIN, is also the principal owner of one other registered investment adviser, Magnifi LLC and the two broker-dealers mentioned in Item 10 A. above. TIFIN Give is also under common control with Paralel Advisors LLC, a registered investment adviser.

TIFIN Give and Magnifi LLC have engaged an affiliated, offshore service provider that provides product development including code and application programming interfaces in addition to providing testing and quality control services. The cost and expenses associated with the service provider are borne by TIFIN Give and its affiliates, not by Clients.

Dr. Vinay Nair, the Chief Executive Officer of TIFIN, also has significant managerial duties for the above mentioned advisory affiliates. e.

#### **D. Selection of Other Advisors or Managers**

TIFIN Give does not utilize or select other advisors or third-party managers, however, DAF advisors who use the Platform to provide investment advisory services to the DAF accounts are themselves investment advisers. Clients direct TIFIN Give to engage approved DAF advisors for the purpose of using the Platform to provide investment recommendations through the Platform.

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

### **A. Code of Ethics**

TIFIN Give has adopted a Code of Ethics (the “Code”) pursuant to Rule 204A-of the Advisers Act. The Code governs the activities of each member, officer, director and employee of TIFIN Give (collectively, “Employees”). TIFIN Give holds its Employees to a high standard of integrity and business practices that reflects its fiduciary duties to the Client. In serving its Clients, TIFIN Give strives to avoid conflicts of interest or the appearance of conflicts of interest in connection with the personal trading activities of its Employees and Client securities transactions. When persons covered by the Code engage in personal securities transactions, they must adhere to the following general principles as well as to the Code’s specific provisions: (a) at all times the interests of the Client must be paramount; (b) personal transactions must be conducted consistent with the Code in manner that avoids any actual or potential conflict of interest; and (c) no inappropriate advantage should be taken of any position of trust and responsibility. Employees covered by the Code have certain trading restrictions and reporting obligations of their personal securities transactions. Each Employee is provided with a copy of the Code and must annually certify that they have received it and have complied with its provisions. In addition, any Employee who becomes aware of any potential violation of the Code is obligated to report the potential violation to the Chief Compliance Officer.

TIFIN Give will provide a copy of its Code of Ethics to Clients and prospective Clients upon request. Such a request may be made by submitting a written request to TIFIN Give at the address on the cover page to this Brochure.

### **B. Recommendations Involving Material Financial Interests**

Neither TIFIN Give nor its related persons recommend to Clients, or buy or sell for Client accounts, securities in which TIFIN Give or a related person has a material financial interest. However, as detailed above in Item 5.C, certain Fund Managers pay TIFIN Give or its affiliate(s) sponsorship fees in order to enhance the visibility of their Sponsored Funds on the Platform. TIFIN Give and its affiliates are not directly compensated for the sale of Sponsored Funds in the form of commissions or asset-based fees.

### **C. Investing Personal Money in the Same Securities as Clients**

From time-to-time TIFIN Give, its Employees and/or the related persons may also personally buy or sell the same securities that TIFIN Give’s Clients buy or sell, and it or they may own ETFs, or options on ETFs, that are subsequently bought for Clients because of TIFIN Give’s recommendations regarding a particular ETF. TIFIN Give’s policy as to such transactions is that neither TIFIN Give nor its Employees or related persons are to benefit from price movements that may be caused by transactions for Clients or otherwise. TIFIN Give addresses this conflict by requiring Employees to sign and adhere to TIFIN Give’s Code of Ethics and to report personal securities holdings and transactions to TIFIN.

D. Trading Securities At/Around the Same Time as Clients' Securities

As discussed above, from time-to-time, TIFIN Give, its Employees, or related persons of TIFIN Give may buy or sell securities for themselves that TIFIN Give also recommends to a Client. TIFIN Give will always document any transactions that could be construed as conflicts of interest and will always transact Client business before the business of its Employees and/or related persons when similar securities are being bought or sold.

## **Item 12 – Brokerage Practices**

A. Factors Used to Select or Recommending Broker-Dealers

TIFIN Give does not have discretion as to the placement of brokerage (and accordingly, the commission rates paid). The Client selects the custodian broker-dealer and TIFIN Give plays no role in selecting the broker-dealer.

1. Research and Other Soft Dollar Benefits

TIFIN Give does not receive any research or other products or service other than execution from a broker-dealer or third-party in connection with Client securities transactions. If in the future TIFIN Give obtains so-called “soft-dollar” benefits, this Brochure will be appropriately amended.

2. Brokerage for Client Referrals

TIFIN Give does not select or recommend brokerage for Clients.

3. Directed Brokerage

TIFIN Give has no discretion over the brokers utilized by Clients. TIFIN Give has not negotiated the terms and conditions of the broker's service terms (including, but not limited to, commission rates); in this case, TIFIN Give does not have responsibility for obtaining the best prices or particular commission rates with or through any such broker, and the client may not obtain rates as low as it might by following TIFIN Give's recommendations.

B. Aggregating Trading for Multiple Client Accounts

TIFIN Give does not combine orders on behalf of one Client account with orders for other Client accounts for which it or its principals have trading authority, or in which it or its principals have an economic interest.

## **Item 13 – Review of Accounts**

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

The Platform is designed to provide Clients with continuous access to account information. Through TIFIN Give's website, Clients and DAF Advisers can login to view their own or their client's as applicable, personalized profiles and investment recommendations.

TIFIN Give's investment recommendations are based on the historical charitable giving of the DAF which has been provided through the Platform and other information submitted by the Client through the profile questionnaire on TIFIN Give's website. TIFIN Give frequently adjusts the investment recommendations as the DAF's charitable giving changes.

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

None. Clients should be aware that DAF positions are not actively monitored directly by investment advisory personnel.

C. Content and Frequency of Regular Reports

TIFIN Give will not itself provide any reports concerning Clients. Clients receive account statements from their custodians.

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

A. Economic Benefits Provided by Third Parties

TIFIN Give may enter into partnerships with and receive sponsorship fees from third party fund managers. Under these arrangements, advisers to Sponsored Funds pay TIFIN Give sponsorship fees in order to enhance the visibility of their Sponsored Funds on TIFIN Give's platform.

These payments create a conflict of interest in that they provide an incentive for TIFIN Give to recommend them above other securities.

B. Compensation to Non-Advisory Personnel for Client Referrals

Currently, neither TIFIN Give, nor its related persons directly or indirectly compensate any person who is not advisory personnel for Client referrals. TIFIN Give and its affiliates may refer Clients to each other; however, no compensation will be paid for any such referrals. If in the future TIFIN Give enters into such arrangements, this Brochure will be appropriately amended.

### **Item 15 – Custody**

TIFIN Give does not have custody of Client assets. Client assets will be maintained by the Client with one or more banks, brokerage firms, and/or other qualified custodians that serve as custodians of the funds and/or securities of the Clients. Clients will receive account statements from their custodians. Clients are encouraged to carefully review the account statements provided by their custodians and to compare these to any reports provided by TIFIN Give.

### **Item 16 – Investment Discretion**

Once a Model Portfolio has been approved and selected, TIFIN Give has discretionary authority to determine the securities to be bought or sold, and the amount of securities to be bought or sold consistent with that Model Portfolio. TIFIN Give does not have discretion to determine the broker-dealer to be used for the purchase or sale of securities, and commission rates to be paid to a broker-dealer in a Client's account.

## **Item 17 – Voting Client Securities**

TIFIN Give does not have authority to vote proxies on behalf of Clients.

## **Item 18 – Financial Information**

### **A. Balance Sheet**

TIFIN Give 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 Condition**

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

### **C. Bankruptcy Petitions in Previous Years**

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