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Brochure

TINSLEY-LYNOTT FAMILY WEALTH ADVISORS™

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This brochure provides information about the qualifications and business practices of Tinsley-Lynott Family Wealth Advisors. If you have any questions about the contents of this brochure, please contact us at 619-241-2832 or by email at tlfamilywealth@gmail.com. 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.

Tinsley-Lynott Family Wealth Advisors is a Registered Investment Adviser. Being registered with the SEC or any other regulatory authority does not imply Tinsley-Lynott Family Wealth Advisors has a certain level of skill or training.

Additional information about Tinsley-Lynott Family Wealth Advisors is available on the SEC's website at www.adviserinfo.sec.gov

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Advisory Business

Firm Description

Tinsley-Lynott Family Wealth Advisors ("TLFWA"), a privately held company, is an investment adviser with offices in California. TLFWA is registered with the U.S. Securities and Exchange Commission ("SEC"). Being registered with the SEC or any other regulatory authority does not imply TLFWA has a certain level of skill or training.

TLFWA will manage assets within its Tinsley-Lynott Family Wealth Advisors Institutional Group, Tinsley-Lynott Family Wealth Advisors U.S. Private Client Group, Tinsley-Lynott Family Wealth Advisors International Private Client Group, and Tinsley-Lynott Family Wealth Advisors 401 (k) Solutions Group. Collectively, these groups will serve a global client base of diverse investors including corporate, public and multi-employer pension plans, foundations and endowments, insurance companies, healthcare organizations, governments, investment companies and high-net-worth individuals across America, Europe, Canada, Asia, Australia, and the Middle East.

The firm offers a broad array of US, non-US, and global equity strategies with various capitalization and style orientations. Founded in 2019, all strategies are supported by the firm's founder and global research partners developed over a 50+ year history. In 2019, TLFWA began offering separate portfolio management directly to high-net-worth individuals. In early 2019, TLFWA expanded service offerings into Canada and Europe. 40 I (k) Solutions was launched in 2019.

TLFWA's business is based on maintaining a culture of ethics and integrity with the highest possible emphasis on clear and transparent communications with the investing public. Embedded within the firm's culture is its embrace of the fiduciary duty to put client interests first. TLFWA fosters a culture that hires, trains, and rewards employees in direct support of the values of openness, honesty, integrity, and trust.

A culture that fosters transparency is core to TLFWA's client service model. Every private client is assigned a dedicated Investment Counselor who gets to know that client by name and is available to answer questions in as much detail or as frequently as the client would like. TLFWA supplies clients with quarterly statements and written reviews. TLFWA creates periodic pre-recorded videos explaining the firm's outlook, which expands on many of the themes in the quarterly reviews and gives clients a chance to hear directly from portfolio decision-makers.

For clients who prefer in-person communication, who prefer smaller events or want more interaction, TLFWA offers Investment Roundtable events in San Diego, CA which are also conducted by senior members of the firm, but focus more on in-depth, discussion-oriented Q&A with roughly 1-12 participants. For clients who would like to learn more about market basics, the firm provides Investment Education Webinars and videos, which are classroom-style sessions focused on explaining more sophisticated investment principles and strategies.

Principal Owners

Tinsley-Lynott Family Wealth Advisors is a sole proprietorship, wholly owned by Thomas Lee Lynott.

Types of Advisory Services

TLFWA provides management services for clients within the categories of equity, fixed income, and balanced accounts. All accounts have the goal of maximizing returns relative to risk, compared to particular benchmarks.

- Equity accounts seek to do this using primarily common stock ETFs and cash equivalents.

- Fixed income accounts use various fixed income instruments and cash.
- Balanced accounts use primarily a combination of equities, both U.S. and International, fixed income instruments, and non-correlated assets such as Real Estate and tangible assets and commodities as well as cash equivalents, seeking to maximize returns for units of risk taken.

TLFWA manages money for clients in one of these three fashions based on individual discussions with each client about the client's overall financial goals. TLFWA also may engage in various defensive strategies in each of these styles in an effort to minimize losses or to seek investment returns. However, there are special risks involved with those defensive strategies. Refer to Methods of Analysis, Investment Strategies and Risk of Loss on pages 8-9.

TLFWA does not participate in formal wrap account programs, although we occasionally will agree to manage a wrap account. A no-cost separate financial plan is offered to some clients.

Throughout the client relationship, TLFWA strives to keep clients apprised of its strategy and current market outlook. The firm fosters a culture that focuses on maintaining transparency and openness for successful relationships and stresses this as both a core company value and an expectation of all employees in their dealings with clients and each other.

Assets under management

TLFWA manages client assets on a discretionary basis. As of January 1st, 2019, TLFWA managed a total of:

	Private Client	Institutional	Total
Discretionary	\$0	\$0	\$0
Non-Discretionary	\$0	\$0	\$0
Total	\$0	\$0	\$0

Fees and Compensation

Description

While at times TLFWA may negotiate rates other than specified below, the following schedule lays out TLFWA's private client basic billing rates:

Equity and Balanced Accounts	Annual Management Fees
First \$1 million	1.25%
Next \$4 million	1.125%
Additional Amounts Over \$5 million	1.00%

Income Only Account in Excess of \$5 million	Annual Management Fee
First \$5 million	0.85%
Next \$10 million	0.60%
Next \$10 million	0.50%
Next \$10 million	0.40%
Next \$10 million	0.30%
Next \$45 million	0.25%

TLFWA typically accepts accounts with at least \$1,000,000 in investable assets but may accept smaller accounts at TLFWA's discretion which will be billed at an annual rate of 1.50%. Accounts that fall below \$400,000 in investable assets due to withdrawal will be billed at the annual rate of 1.60%.

TLFWA will aggregate for billing at the equity and balanced account fee schedule listed above for multiple accounts established by a client where the initial funding for all the accounts is equal to or greater than \$1,000,000. The funding must occur within 90 days of the start of the relationship and each individual account within the relationship must be equal to or greater than \$500,000.

TLFWA may negotiate certain fixed rates with clients that can apply to all asset levels. TLFWA provides advisory services to clients in a limited number of special situations for substantially reduced or no advisory fees. These include certain accounts for friends of the firm, relatives or children of other clients, and legacy accounts that have been clients for many years. Certain clients who become clients of TLFWA as a result of its merger and acquisition activities may retain their prior fee schedules and therefore pay higher or lower fees than other TLFWA clients. TLFWA rebates fees to certain investors who surrender annuities, CDs, Load mutual funds, REITS, other securities, or instruments to have the proceeds managed by TLFWA. TLFWA will not negotiate advisory fees to manage a plan fiduciary's personal assets in connection with plan assets.

Fee Billing

Investment management account fees are normally based on a percentage of total assets under management (AUM) for long positions. Fees are generally calculated and charged quarterly. Fees are based on the market value using closing prices at quarter end, at one-quarter of the annual rates listed above. The quarter ending value includes accrued interest and/or dividends. Fees are billed and paid after they are earned. Fees for the investment management services provided by TLFWA, which may begin before assets are received into the client's account, are typically calculated and charged beginning on the date the Letter of Agreement with TLFWA ("LOE") is signed by the client. The initial services include, without limitation, conducting a comprehensive suitability evaluation with the client; analyzing the client's assets, goals, objectives, restrictions, values, and any other relevant circumstances; making investment recommendations; and providing updated research to the client regarding TLFWA's views on the market. The fee will be calculated and deducted from the client's account each calendar quarter following the billing date as stated in the client's LOE.

Unless the LOE is signed on the first day of the calendar quarter, fees for the initial billing period will be calculated based on the number of calendar days from the date the LOE is signed until the end of the quarter. A fee will not be calculated and billed for an initial billing period if there are no assets in the client's account or the number of billing days in the period is less than 16. Instead, the following calendar quarter may be combined with the initial billing period, making the billing period longer than the one calendar quarter depending upon when assets are received into the account and TLFWA begins trading in the client's account. The fee will be calculated for that entire longer period based on the account value at the end of the following calendar quarter. Any net contributions or withdrawals made after the initial billing period that is equal to or greater than \$50,000 will be prorated if the fee adjustment is greater than .0025% of the client's quarter-end assets under management by TLFWA and for the contributions/withdrawals greater than or equal to \$100.

In general, a client may terminate the LOE with TLFWA at any time by notifying TLFWA in writing. At such time, TLFWA will bill the client for services already rendered, prorated through the calendar day prior to the date of termination. Since TLFWA does not bill in advance, a refund of fees is not applicable.

Other Fees

Clients may incur fees in addition to the management fee paid to TLFWA, as stated above. Such fees can include brokerage fees and commissions, other custodian fees, and expenses for investing in exchange traded funds or structured notes. **TLFWA does not earn such other fees.** Please refer to Brokerage Practices on the following pages for additional information on how TLFWA selects brokers.

TLFWA will waive its separate account advisory fee to the extent accounts indirectly pay an advisory fee by investing in shares of the funds managed by TLFWA described in the Affiliations section below that pay TLFWA an advisory fee. TLFWA may instead reduce its advisory fee payable by the funds. Clients would pay for all the operating and other expenses associated with an investment in the funds as well as with the separate account.

The use of defensive strategies may increase trading activity, and thus the recognition (for income tax purposes) of gains and losses, and increase other expenses (such as brokerage charges) compared to accounts that do not use these techniques. Refer to Methods of Analysis, Investment Strategies and Risk of Loss below.

Performance-Based Fees and Side-By-Side Management

Sharing of Capital Gains

TLFWA does not typically charge performance-based fees for private client accounts, but may for institutional clients who specifically request it if appropriate. Performance-based fee arrangements may permit TLFWA to receive compensation for unrealized appreciation as well as realized gains and may create an incentive for TLFWA to make riskier or more speculative investments. Managing accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as a fixed-rate fee, presents certain conflicts of interest in managing these accounts at the same time. There is an incentive to favor performance-based fee accounts. TLFWA's policies and procedures have been developed to ensure that all clients are treated fairly and equally, and without regard to the fee type in determining trade allocation. Refer to Order Aggregation on page 14. TLFWA reviews trade aggregation and allocation policies and procedures at least annually to ensure adherence to firm procedures and that no client is being systematically favored.

Types of Clients

Description

TLFWA seeks a global client base of diverse investors in an advisory and sub-advisory role including corporations, public and multi-employer pension funds, foundations, endowments, governments, investment companies and high-net worth individuals across America, Europe, Canada, Asia, and the Middle East.

Account Minimums

At present, TLFWA seeks accounts with at least \$1,000,000 in investable assets, but may accept smaller accounts at TLFWA'S discretion.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

TLFWA uses both qualitative and quantitative tools to analyze markets, sectors, and securities. TLFWA makes extensive independent research firms and the use of computers, computer peripherals, software, and computer databases in screening for investments worthy of investment consideration. TLFWA uses a centralized portfolio management system, which includes block trading, portfolio management, and securities price data collection.

Investment Strategies

Private clients are generally invested in an equity, fixed income, or balanced account based on their individual financial goals and objectives, restrictions, or investment limitations as expressed by the client. TLFWA can adjust its investment strategy for each client as appropriate depending on its forward-looking view of market conditions. For equity and balanced accounts, TLFWA seeks to maximize opportunity and manage risk by investing globally to take advantage of worldwide opportunities by investing in equities, fixed income securities, structured products, Direct Participation Partnerships, or other derivatives that may or may not include leverage. However, if TLFWA forecasts a bear market on the horizon, a defensive approach may be taken. TLFWA's goal is simply to help clients achieve their financial goals, regardless of market conditions.

TLFWA uses industry acknowledged investment benchmarks as a basis for constructing client portfolios, managing portfolio risk, and monitoring client portfolio performance by comparing rates of return over different periods of time to these benchmarks. TLFWA can provide information about particular investment benchmarks and how they are selected and constituted upon client's request.

If TLFWA forecasts a prolonged and substantial downturn for the U.S. and/or the foreign stock markets, it may adopt a defensive strategy for clients' equity accounts by investing substantially in fixed income securities, money market instruments, structured or exchange traded notes, put options or other derivatives on securities or indexes or exchange traded funds, and other hedging techniques. There can be no guarantee that TLFWA will accurately forecast any prolonged and substantial downturn in the market, or that the use of derivative s and other defensive techniques would be successful in avoiding losses. These defensive strategies may be used for a client's account only to the extent not prohibited by the LOE, custodial limitations, and applicable law. Clients may specifically request, in writing, TLFWA to limit or avoid the use of these defensive techniques in their accounts.

Derivatives typically derive their value from the performance of an under lying asset, interest rates, or an index. A client's account would lose the premium or other transaction costs related to the purchase of an option - a type of derivative - that expires worthless. The price movements of derivatives may be more volatile than those of other securities and result in increased investment risk. Many of these investments may not enjoy as much liquidity as other securities; although, consistent with its investment strategy TLFWA will seek to invest in liquid investments to the extent they represent the best investment option in TLFWA's view. TLFWA will normally cause client accounts to "cover" options they write with the underlying security and other liquid assets.

Structured and exchange traded notes are debt instruments whose return is derived from the performance of a referenced index or other underlying securities or investments. The performance of a note is determined primarily by the performance of the underlying investments; therefore, despite technically being a corporate debt instrument, notes can be designed to provide returns similar to other asset classes. These notes may include leverage, which potentially increases risk and volatility. These notes are issued by third-party financial institutions and banks, and thus bear the credit risk of those entities. Though TLFWA may choose the nature of the note and define the underlying investments, the third-party financial institution will manage the note and charge a management fee to do so. Financing and other charges may also apply depending on the nature of the note and its construction.

Risk of Loss

Investing in capital markets involves risk of loss that each client should be prepared to bear. Investing in foreign stock markets involves additional risks including political, economic, and currency risks, as well as differences in accounting methods. Investing in fixed income instruments may involve certain costs and risks such as liquidity risk, interest rate risk, and credit risk. Portfolios investing in derivatives could lose more than the principal amount invested in those instruments. There can be no guarantee that a portfolio will meet its investment objectives or that it will not suffer losses.

Disciplinary Information

Legal and Disciplinary

There have been no disciplinary events and no material legal events related to TLFWA or any management person.

Other Financial Industry Activities and Affiliations

Financial Publications

TLFWA may be a contributor to various publications (for example: Judicial Watch, Stansberry Research Digest and Richard Smith's Ideas). Tinsley-Lynott Family Wealth Advisors may or may not hold some or all of the securities mentioned in a particular article in a client's portfolio.

Affiliations

None

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

Code of Ethics and Personal Trading

Ethics and integrity are the bedrock on which the rest of our business is built. When TLFWA employees invest for their own accounts, conflicts of interest may arise between clients and employees. As an investment adviser TLFWA is subject to Rule 204A-1 of the Advisers Act. To comply with these requirements, TLFWA has adopted a Code of Ethics containing provisions reasonably necessary to prevent its "Access Persons," as defined in the Code of Ethics, from engaging in any act, practice or course of business prohibited by the Rules. The Code of Ethics addresses investments by Access Persons in securities with particular rules for initial public offerings and limited offerings.

In accordance with TLFWA's Code of Ethics, all Access Persons and Principals may hold securities, which were purchased previous to their employment with TLFWA, and are now still held. Access Persons and Principals may participate in block transactions placed for clients. Additionally, Access Persons and Principals must submit all brokerage statements, which reflect transactions for their benefit, to ensure this policy is implemented according to stated objectives. TLFWA will provide a copy of its Code of Ethics upon request.

In addition to these explicit policies, we also stress ethics in our company vision statement, which states that "Tinsley Lynott acts as a trusted and knowledgeable fiduciary in all our transactions and dealings with clients. We do not waiver from that obligation and credo"

Participation or Interest in Client Transactions

TLFWA imposes restrictions upon itself and all managed accounts that have a relationship with a TLFWA Access Person or Principal to ensure the clients' interests are considered before the interests of TLFWA or any person who may be associated with TLFWA. Such accounts are called proprietary accounts. They will trade in block trades with or after non-proprietary clients. Exceptions may be made to liquidate certain previously held equity positions in proprietary accounts that cannot be blocked with non-proprietary clients provided a determination is made that no non-proprietary client will be disadvantaged. All proprietary clients are aware of such trading practices. At no time will transactions be effected in any manner such that TLFWA or the TLFWA Access Person could benefit at the expense of a non-proprietary client.

Political Contributions

TLFWA personnel may make personal contributions to support political candidates or elected officials, including candidates who may share the firm's views on issues related to its business interests. Designated personnel are responsible for ensuring that their political activities comply with applicable laws restricting political contributions and solicitations, as well as TLFWA's policies and procedures.

Brokerage Practices

Selecting Brokerage Firms

TLFWA generally determines both the brokers to be used to effect transactions for clients and the commissions at which those transactions are to be effected. Brokers are selected on the basis of the clients' interests and desires and TLFWA's assessment of their execution and other services relative to the commission charged for each trade. TLFWA evaluates brokers' fees and commission rates in light of rates other advisers could readily obtain from brokers in general for similar transactions.

Each client's investment advisory agreement generally gives TLFWA full authority to determine (without obtaining client consent or consulting with the client on a transaction-by-transaction basis) the brokers or dealers through which all transactions for the client's account will be executed. A client may, however, direct TLFWA to execute transactions for the client's account through a specified broker or dealer (the "Specified Broker"). A client may choose to direct TLFWA in writing to execute transactions through a Specified Broker if, for example, the client will be receiving investment management consulting services from such Specified Broker.

Best Execution

Where a client authorizes TLFWA to select the brokers and/or dealers through which transactions for the client's account are executed, TLFWA allocates transactions to brokers and/or dealers for execution on such markets at such prices and at such commission rates (which may be in excess of the prices or commission rates that might have been charged for execution on other markets or by other brokers or dealers) as in the good faith judgment of TLFWA are appropriate. TLFWA considers the selection of brokers and/or dealers based not only on the available prices and rates of brokerage commissions, but also other relevant factors which can include:

- the execution capabilities of the brokers and/or dealers;
- the markets and types of securities that the broker/dealer makes transactions in;
- research, custodial, trade generation and management software, and other services provided by such brokers and/or dealers which are expected to enhance TLFWA's general management capabilities.
- the difficulty of execution;
- the size of the transaction;
- the operational facilities of the brokers and/or dealers involved;
- the quality of the overall brokerage and research services provided by the broker and/or dealer

TLFWA may cause a client's account to pay a broker or dealer a higher amount of commission for effecting a transaction for the client's account than another broker or dealer would have charged for effecting that same transaction if TLFWA determines in good faith that the amount of commission is reasonable in relation to the value of the brokerage and research services provided by the broker or dealer, viewed in terms of either the particular transaction or TLFWA's overall responsibilities with respect to the accounts for which TLFWA exercises investment discretion.

Where a client directs TLFWA to effect transactions for the client's account through a Specified Broker, TLFWA does not negotiate brokerage commissions with respect to transactions executed by the Specified

Broker for the client's account. Rather, the client and the Specified Broker agree on the commission rate that the Specified Broker will charge for transactions effected for the account. As a result, the client may pay higher commissions than those paid by TLFWA's clients who have not directed TLFWA to execute transactions through a specified broker or dealer depending upon:

- the client's arrangement with the Specified Broker;
- such factors as the number of securities, instruments, or obligations being bought or sold for the client, whether round or odd lots are being acquired for the client and the market for the security, instrument or obligation
- the fact that the client will be foregoing any benefit from savings on execution costs that TLFWA may obtain for its clients through negotiating volume commission discounts on batched transactions.

In addition, the client may not receive the lowest available price with respect to certain transactions effected for the client's account. Conflicts may arise between the client's interest in receiving best execution on transactions effected for its account and TLFWA's interest in receiving future client referrals from the Specified Broker. TLFWA believes that no conflict of interest that is detrimental to the client will result, since through full disclosure, the clients will have the opportunity to determine what is in their best interests. Clients that restrict the use of soft dollars for their accounts may receive lower commissions for certain trades but may also be traded separately in a less advantageous manner than those trades which can be aggregated with other soft dollar trades.

Soft Dollars

Under TLFWA's "Section 28(e)" soft dollar policies, our research and trading departments use research products and services (such as Morningstar, MSCJ, FactSet, Stansberry Research, Tradesmiths and other research data services) used in the investment decision making process. TLFWA also uses pre-trade and order execution systems to effect securities transactions and perform trading and settlement functions. These products and services are provided by or paid by broker-dealers through which TLFWA executes clients' trades. TLFWA will also make an allocation and pay for the reasonable value of those research and trading services it uses for purposes other than making investment decisions or effecting trades for clients.

Most broker-dealers that provide custody of client assets or effect securities transactions provide their own research services such as reports, access to website materials, and access to their analysts. In some cases, TLFWA uses that research if it is believed to be useful and of reasonable value. In other cases, TLFWA receives unsolicited research from those broker-dealers that may be considered a soft-dollar benefit, even if the research is not requested or used by TLFWA.

Generally speaking, all of TLFWA's clients benefit from research services provided to TLFWA by the brokers and dealers who effect transactions for TLFWA's client accounts. Not all such research services, however, may be used by TLFWA in connection with the client accounts that paid commissions to the brokers or dealers providing such research services. In addition, instances may arise where: (a) research services obtained in connection with transactions effect for a particular client's account will typically benefit other clients of TLFWA whose commissions may or may not have been used to pay for such research services or who do not allow use of commissions to generate soft dollar benefits; and (b) not all research services may be used by TLFWA after payment of commissions by clients. TLFWA's receipt of research services from brokers and dealers that effect transactions for TLFWA's client accounts does not reduce TLFWA's customary research activities. TLFWA may pay commissions higher than those obtainable from other broker as a result of its soft dollar arrangements.

Order Aggregation

TLFWA has adopted the following allocation policy and procedure for aggregating advisory clients' trade orders.

- Orders will not be aggregated unless aggregation is consistent with our best execution duty and the applicable advisory agreements.
- No advisory account will be consistently favored over any other account.
- Before entering an aggregated order, an electronic summary of the allocation shall be made in connection with that order.

TLFWA's TLFWA determines the securities to be purchased and sold in client accounts where TLFWA acts with discretion. TLFWA will aggregate all orders directed by the TLFWA by custodian and prime broker eligibility for trade routing. If a block is being executed with a broker and then trading commences with a different broker for that block, the initial ticket is closed. If the remaining block is returned to the initial broker after partial execution elsewhere, a new ticket is created and executions will receive a separate average price.

When transactions are aggregated into blocks:

- The actual execution prices applicable to the aggregated transaction will be averaged, and each client account participating in the aggregated transaction will be deemed to have purchased or sold its share of the security, instrument, or obligation involved at that average price.
- All transaction costs incurred in effecting the aggregated transaction shall be shared on a pro rata basis among all participating accounts, except to the extent certain broker-dealers that also furnish custody services may impose minimum transaction charges applicable to some of the participating accounts. Client direction and restrictions may result in different costs for a particular client.
- When blocks are partially executed, trades will be allocated to accounts alphabetically, broken up by custodian on a rotational basis. In cases where rotating through single block orders is not effective for partially executed trades, orders may be grouped into "super blocks", or groups of multiple orders. Super blocks are treated the same as normal blocks in terms of rotation. Individual custodian blocks determined to be insignificant in size relative to the overall order may be traded outside the rotation.
- Certain accounts with special mandates or restrictions will not be included in the rotation process. In order to satisfy the requirements and restrictions for these accounts, they will be traded separately. For that reason, these accounts will normally be traded after trades have been executed in other accounts managed by TLFWA and, therefore these accounts have the potential to be executed on different terms, which can be less or more favorable and less promptly depending on market conditions. Clients with these special accounts are informed of these limitations.
- Client mandated orders are generally segregated from existing blocks and executed at the market. If it is deemed that executing the order at the market may have significant market impact, the order will be executed with discretion.
- Orders to unwind option positions associated with equity positions will be segregated from existing blocks. The equity and option orders will generally be executed as close together as possible.
- Orders will be allocated on a basis different from the above only if all clients receive fair treatment and the reason for the different allocation is approved by a member of the TLFWA member in writing. Common reasons for deviations include, but are not limited to; cash balance differences and relative position sizes.
- Books and records will reflect separately for each account the securities held, bought, and sold.
- Individual investment advice and treatment will be provided to each client's account.
- TLFWA does not participate in initial public offerings and therefore has no allocation policy with respect to such offerings.
- No additional compensation or remuneration of any kind will be received by TLFWA as a result of the procedure.

Trading Errors

Trading errors sometimes happen for various reasons that may or may not be TLFWA responsibility. TLFWA handles trading errors according to its trade error policy and procedure, including the use of trade error accounts intended to absorb unfavorable consequences of trade errors (as well as favorable consequences when deemed not beneficial to the client) to reduce the chance that clients would be affected. TLFWA may aggregate the balances of its error accounts among various broker-dealer and bank custody accounts on a quarterly basis to determine whether to donate aggregate gains to charity or to contribute to one or more accounts for aggregate losses. In any event, the client will always be made whole and soft dollars will never be used to correct trade errors.

Review of Accounts

Periodic Reviews

Account information, including quantities and values of securities held, the amounts of cash and cash equivalents, and account transaction activity for each client is maintained in TLFWA's computer systems. This account information is reconciled against statements or electronic files from appropriate custodial agents generally daily, but no less than monthly.

Review Triggers

All existing managed accounts are subject to periodic reviews depending on the criteria being evaluated. Most reviews utilize computer-generated exception reports from TLFWA's portfolio management and accounting systems. Cash balance, position count, position size, asset allocation, country weight, and sector weight reports are among the measures periodically evaluated. Additionally, ad hoc reports supplement the review process.

Regular Reports

Clients receive a quarterly accounting showing asset value by security, unit cost, total cost, cash balances, current per share values, etc. Clients are urged to compare the quarterly reports provided by TLFWA with those provided by their custodian and notify TLFWA of any differences. Additionally, clients regularly receive Quarterly Reviews, which include the general economic outlook and current investment trends. Clients are encouraged to phone or write TLFWA as often as they deem necessary to receive information regarding the investment tactics and strategies being followed. Upon specific client request, TLFWA will prepare written portfolio analysis and reports to satisfy the client's informational needs.

Client Referrals and Other Compensation

Incoming Referrals

From time to time, TLFWA has client referral relationships with outside vendors and/or independent, unaffiliated third-party custodians which provide services that may include custody of securities, trade execution, and clearance and settlement of transactions. Potential conflicts of interest may arise from these referral relationships, as TLFWA may receive certain economic benefits through its participation in these relationships. In addition, TLFWA may have an incentive to recommend to clients that their assets be held with the third-party custodians with which TLFWA has referral relationships, although there is no direct link between TLFWA's involvement in referral relationships and the investment advice it gives to its clients. TLFWA also has incentives for its personnel to solicit and refer clients. TLFWA occasionally pays a referral fee to third-party solicitors. No fee is paid unless a signed contract is executed and the prospective client signs a disclosure form that contains the details of the referral agreement. TLFWA's participation in referral relationships does not reduce or eliminate TLFWA's fiduciary duties to put the interests of its clients first and seek best execution in securities transactions on behalf of its clients.

Other Compensation

TLFWA may have obligations under referral programs with custodians with respect to certain clients, including certain clients who become clients of TLFWA as part of its merger and acquisition activities. Pursuant to such programs, TLFWA is obligated to pay the custodian an ongoing fee, usually as a percentage of the fees billed to the account or a percentage of the assets in the account, with a one-time fee generally payable in the event the account is transferred away -from such custodian. Since the one-time fee is generally higher than the ongoing fee, TLFWA will have an incentive to maintain the account at the existing custodian. TLFWA may from time to time prepare Financial Plans and Recommendations for potential Investment Management clients and will charge a separate fee for these services which is not contingent upon or based on the potential Assets Under Management (AUM) of the potential client.

Custody

Account Statements

TLFWA is not a broker-dealer and does not take possession of client assets. TLFWA client assets are housed in nationally recognized brokerage firms, otherwise known as custodians. TLFWA has a limited power of attorney to place trades on the client's behalf. The custodian will issue trade confirmations and monthly statements directly to clients, while the client's account will be managed by TLFWA. Clients are urged to compare the information in their quarterly TLFWA statements with the statements provided by their custodian.

TLFWA will work with the client and custodian to open and establish a custodian account. It is possible a prospective client will be assigned to a new custodian even if their existing account is at a custodian TLFWA uses. Once opened, TLFWA will notify the client of the custodian's name, address, and the manner in which the funds or securities are maintained, and promptly thereafter of any changes to this information.

Direct Debit of Fees

TLFWA does have the ability to directly debit fees from clients' accounts. TLFWA has policies and procedures in place to ensure fees are calculated correctly and in accordance with clients' agreed upon rates. Refer to Fee Billing under Fees and Compensation.

Investment Discretion

Discretionary Authority for Trading and Limited Power of Attorney

TLFWA generally has limited power of attorney to act on a fully discretionary basis on clients' behalf. When such limited powers exist between TLFWA and a client, TLFWA may choose both the amount and type of securities to be bought and sold to satisfy account objectives. This is the case with most of TLFWA's clients. Additionally, TLFWA accepts any reasonable limitation or restriction to such authority placed by the client. Refer to Methods of Analysis, Investment Strategies and Risk of Loss. All limitations and restrictions placed on accounts must be provided to TLFWA in writing.

Voting Client Securities

Proxy Votes

Generally, except to the extent that a client otherwise instructs TLFWA in writing, TLFWA will vote (by proxy or otherwise) on all matters for which a shareholder vote is solicited by, or with respect to, issuers of securities beneficially held in client accounts in such manner as TLFWA deems appropriate in accordance with its written policies and procedures. These policies and procedures set forth guideline s for voting (or abstaining from voting) many typical proxy proposals. TLFWA regularly reviews these guidelines. In certain instances the

TLFWA may determine it is in the client's best interest to vary from the guidelines or the proxy issue may require individual case-by-case consideration under the guidelines. Where a proxy proposal raises a material conflict of interest between the interests of TLFWA and its clients, TLFWA will vote in accordance with the guidelines where TLFWA does not have discretion to vary from the guidelines. Alternatively, TLFWA will obtain voting direction from Institutional Shareholder Services ("ISS"), an independent third-party proxy service provider, disclose the conflict of interest to the client and abstain from voting, or obtain client consent prior to voting the securities. Clients may obtain a copy of TLFWA proxy voting policies and procedures and/or information on how TLFWA has voted the client's securities by written request to TLFWA. There may also be a variety of corporate actions or other matters for which shareholder action is required or solicited and with respect to which TLFWA may take action that it deems appropriate in its best judgment except to the extent otherwise required by agreement with the client. These actions may include, for example and without limitation, tender offers or exchanges, and bankruptcy proceedings.

Unless TLFWA otherwise agrees in writing, TLFWA will not have any duty or obligation to advise or take any action on behalf of clients in any legal proceedings, including bankruptcies or class actions, involving securities held in or formerly held in the client's account or the issuers of securities. At the client's written request, TLFWA will assist when practical with administrative matters regarding any settlement or judgment.

Financial Information

Financial Condition

TLFWA does not require or solicit prepayment of fees. TLFWA is currently not in, nor has been historically in, a financially precarious situation, or the subject to a bankruptcy petition.

Additional Information: Fair Valuation

TLFWA is responsible for determining the fair value of illiquid securities and other holdings in the unlikely event a price is not readily available or after a significant event materially affects the value of a security between the time of its last sale on the exchange or market in which the security trades, and the US market close. TLFWA's Valuation Committee meets as necessary when a price is not readily available and may determine if the value of a security should be re-evaluated to reflect a more current fair market value. Custodians for some clients may have alternative valuation procedures that will apply to accounts managed by TLFWA.

What Tinsley-Lynott Family Wealth Advisors does with your personal information

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number
- Account balances and account transactions
- Assets and transaction history

When you are no longer our customer, we continue to share your information as described in this notice. All financial companies need to share customers' personal business. In the section below, we list the reasons

financial companies can share their customers' personal information, the reasons Tinsley-Lynott Family Wealth Advisors chooses to share, and whether you can limit this sharing.

Reasons we share your personal information

The following sharing of information cannot be limited:

- Everyday business purposes, such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus.
- Marketing purposes to offer our products and services to you.
- Joint marketing with other financial companies.
- For our affiliates' everyday business purposes: information about your transactions, experiences, and creditworthiness.

The following sharing of information can be limited:

For non-affiliates to market to you.

Who we are

Who is providing this notice?

Tinsley-Lynott Family Wealth Advisors.

What we do

How does TLFWA protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does TLFWA collect my personal information?

We collect your personal information, for example, when you:

- Open an account or provide account information
- Make deposits or withdrawals from your account or make a wire transfer
- Give us your contact information

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only:

- Sharing information about your creditworthiness for affiliates' everyday business purposes
- Affiliates from using your information to market to you
- Sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

Non-affiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies. Tinsley-Lynott Family Wealth Advisors may share information with non-affiliates so they can market to you if you provide your consent.

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Tinsley-Lynott Family Wealth Advisors does not jointly market.

Other important information

This privacy notice applies to individual consumers who are customers or former customers. This notice replaces all previous notices of our consumer privacy policy and may be amended at any time. We will keep you informed of changes or amendments as required by law.

ERISA Guide to Services and Compensation

The following is a guide to important information that you should consider in connection with the services provided by Tinsley-Lynott Family Wealth Advisors to your Plan. Should you have any questions concerning this guide or the information provided to you concerning our services or compensation, please do not hesitate to contact Tinsley-Lynott Family Wealth Advisors at 619-241-2832.

Required Information	Location
Description of the services TLFWA will provide to your plan.	See page 4&5 - <i>"Types of Advisory Services"</i> And <u>Letter of Agreement</u> Section - <i>"Discretionary investment Management"</i>
A statement that Tinsley-Lynott Family Wealth Advisors will provide the services as an ERJSA fiduciary and registered investment adviser.	See page 4 - <i>"Firm Description"</i> and <u>Letter of Agreement</u> Section - <i>"Retirement or Employee Benefit Plan Accounts"</i>
Compensation Tinsley-Lynott Family Wealth Advisors will receive from your Plan ("direct" compensation).	See page 5 - <i>"Fees and Compensation"</i> <u>Letter of Agreement</u> Section - <i>"Advisory Fees"</i>
Compensation Tinsley-Lynott Family Wealth Advisors will receive from other parties not related to Tinsley-Lynott Family Wealth Advisors ("indirect" compensation).	See page 11 - <i>"Soft Dollars"</i> Tinsley-Lynott Family Wealth Advisors estimates soft dollar commissions to be between 15-20% of total commissions on an annual basis.
Compensation to be paid among TLFWA and related parties.	See page 13-14 <i>"Client Referrals and Other Compensation"</i>

Compensation Tinsley-Lynott Family Wealth Advisors will receive if you terminate this service agreement.	Letter of <u>Agreement</u> Section - " <i>Termination</i> "
Manner in which compensation will be received.	See page 11 - " <i>Soft Dollars</i> " and page 13,14 - " <i>Client Referrals and Other Compensation</i> " and Letter of <u>Agreement</u> Section - " <i>Advisory Fees</i> " Section - " <i>Termination</i> "

Form ADV 2B

Brochure Supplement

TINSLEY-LYNOTT FAMILY WEALTH ADVISORS™

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April 22, 2019

This brochure supplement provides information about the qualifications and business practices of Tinsley-Lynott Family Wealth Advisors. If you have any questions about the contents of this brochure supplement, please contact us at 619-241-2832, or by email at admin@tlfamilywealth.com. The information in this brochure supplement has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Tinsley-Lynott Family Wealth Advisors is a Registered Investment Adviser. Being registered with the SEC or any other regulatory authority does not imply Tinsley-Lynott Family Wealth Advisors has a certain level of skill or training.

Additional information about Tinsley-Lynott Family Wealth Advisors is available on the SEC's website at www.adviserinfo.sec.gov

Thomas L. Lynott

Education and Business Experience

Educ./Payout	Years	Location	Business/Responsibility/Capacity
Pre-school	1947-1948	K.C., MO.	Lemonade stand-Independent contractor- \$2/day
Elementary	1948-1955	Spfld., MO, L.I, N.Y.	Weed pulling, car washing-Indep. cont. - \$15/wk.
Jr. High	1956-1958	Northridge, CA	Paper route, car detailing, pool cleaning- cont - \$100/mo
High School	1958-1959	Northridge, CA	Union 76 Svc. Station Attend.-Employee \$1.25/hr
Summer	1959-1960	Northridge, CA	Arneson Nursery-laborer-Employee \$10/day
UC Berkeley	1960-1962	Berkeley, CA	Student, 3.9 GPA-shared apt. with Angus Black
Summer	1960-1962	Burbank, CA	Flying Tiger Airline-Station agent-Emp. \$2.50/hr.
UCLA	1963-1964	Westwood, CA	Student, 3.7 GPA, Bachelor of Science in Economics
Pt. Time/Smr	1963-1964	Canoga Park, CA	Chuck's Firewood-cut/stack/sell-ind. cont. \$100/rick
Great education	1964-1965	Renton, WA	Boeing Co.-Econ. research-salaried employee \$1,400/mo
Losses 1 st 2 yrs	1965-1967	Marysville, WA	Reinell Boat Co.-Co-owner/CEO./\$600/mo. for 1 st 2 yrs.
*IPO -1969\$1M	1968-1978	Marysville, WA	Reinell Industries, Inc./CEO./\$4,000/mo. + bonuses
*IPO and doubling of sales/EPS four consec. years . Co. subsequently sold to Prvt. Vent. Cap	1969	Marysville, WA .Note: This was a key event providing collateral for acquiring Tacoma Boat Co. from Sea-First bank in 1974.	Upon IPO and increase of share value based on 15 x E.P.S., T.L.'s founder's shares, in 1971 at the age of 29, became worth over \$2 million (approx. \$14 M in today's dollars.) on his original investment of \$7,500. (plus countless hours of time, and personal risk guaranteeing SBA and bank Loans)
*IPO- 1978 \$10 M	1974-1985	Tacoma, WA	Tacoma Boat Co./Shareholder/Advisor/Supplier of FRP parts and molds/Financial advisor to IPO
Modest Gains	1978-1980	Bellevue, WA	Lynott Financial Institute/Founder/Educator
Loss-\$.5 M	1980-1982	Deschutes, OR	General Energy Development/Founder/Maj. S.H.
Went back to mfg. cos.\$5M	1980-1987	Kirkland, WA	Lynott Investment Mngmnt. Co./Lynott Securities, Inc./Founder/CEO/Maj. S.H.
*Buy-out 1986 \$8.5 M	1981-1986	Richland, WA. acquired from Westinghouse, Corp	Sci-Tec Corp. Inc./Co-founder/Maj. S.H./Advisor in sale to Andros Corp. Berkeley, CA
Loss-\$.2 M	1988-1990	Pasco, WA	Camplite-World Class Marine, Inc./Founder/CEO
Small gain	1990-1993	Ensenada, MX Yokohama, Japan	World Class Marine/Founder/CEO/Joint Venture feasibility project with Honda Motor Co.
*Buy-out 2012 \$.2 M over 4 yrs.	1993-2012	Preston, WA Moscow, Russia Changsha, China	Ural America, Inc./CMSI, Inc./TNG Scooters/Co-founder/ CEO/Maj. S.H./Sidecar & solo motorcycles/Scooters/Major COSTCO supplier.
*Buy-out \$25M	1990-1998	Ririe, ID. acquired from U.S. Dept. of Agri.	Idaho Pacific Corp./Potato processing / Maj. S.H./ Director/Financial advisor for sale to P.V.C.
Small gains.<\$100K	2012- 2018	Preston, WA, San Diego, CA	Semi-retired/Yacht and house flipping/continued portfolio management for family.
Series 65 ADV 3 hour Exam, 140 Questions	2019-	San Diego, CA	Tinsley-Lynott Family Wealth Advisors/Founder/SEC Registered Investment Advisor/Business and Estate planning/Financial coaching/CPA Advisor

TINSLEY-LYNOTT FAMILY WEALTH ADVISORS