

# Disclosure Brochure

February 19, 2015

## Total Financial Advisors, LLC

An SEC Registered Investment Adviser

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Bethpage, NY 11714

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This brochure provides information about the qualifications and business practices of Total Financial Advisors, LLC. If you have any questions about the contents of this brochure, please contact Total Financial's Chief Compliance Officer at (516) 579-2700. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Total Financial Advisors, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Total Financial Advisors, LLC. is an SEC Registered Investment Adviser. Registration does not imply any level of skill or training.

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## **Item 2. Material Changes**

There have been no material changes to this Disclosure Brochure since Total Financial's last annual amendment filing on February 14, 2014.

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# Total Financial Advisors, LLC Disclosure Brochure

## Item 4. Advisory Business

Total Financial Advisors, LLC (hereinafter referred to as "*Total Financial*") is located at 24 Union Avenue, Bethpage, NY 11714, and also conducts business under the name Total Financial. Total Financial is an investment adviser providing financial planning, consulting, and investment management services. Prior to engaging Total Financial to provide any of the foregoing advisory services, the client is required to enter into one or more written agreements with Total Financial, setting forth the terms and conditions under which Total Financial renders its services (collectively the "*Agreement*"). Total Financial was formed in May 2007. Joseph Piangozza and Susan Piangozza are the principal owners of Total Financial.

As of December 31, 2014, Total Financial had \$178,300,000 of assets under management on a discretionary basis.

This Disclosure Brochure describes the business of Total Financial. Certain sections will also describe the activities of Supervised Persons. Supervised Persons are any of Total Financial's officers, partners, directors (or other persons occupying a similar status or performing similar functions), or employees, or any other person who provides investment advice on Total Financial's behalf and is subject to Total Financial's supervision or control.

### Financial Planning and Consulting Services

Total Financial may provide its clients with a broad range of financial planning and consulting services (which may include non-investment related matters). These services are tailored to the needs of the client, and include (but are not limited to) retirement planning, financial planning, distribution planning, estate planning, investment planning, and advising on assets not managed directly by Total Financial.

In performing its services, Total Financial is not required to verify any information received from the client or from the client's other professionals (e.g., the client's attorney, accountant, etc.) and Total Financial is expressly authorized to rely on such information. Total Financial may recommend the services of other professionals for implementation purposes including certain of Total Financial's employees or representatives, in their separate individual licensed capacities as licensed insurance agents (See disclosure below).

Clients are advised that a conflict of interest exists if Total Financial or an employee recommends the services of a related person. The client is under no obligation to act upon any of the recommendations made by Total Financial or any employee or representative under a financial planning or consulting engagement, or to engage the services of any such recommended professional, including Total Financial itself or any of its Supervised Persons. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any of Total Financial's recommendations. Clients are advised that it remains their responsibility to promptly notify Total Financial if there is ever any change in their personal or financial situation or investment objectives for the purpose of reviewing, evaluating, or revising Total Financial's previous recommendations and/or services.

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## **Investment Management Services**

Total Financial typically manages clients' assets on a discretionary basis, but may also provide non-discretionary management in special circumstances including, but not limited to, employer sponsored group workplace retirement plans ("Employer Retirement Plans").

Total Financial primarily allocates clients' investment management assets among Independent Managers (as defined below), mutual funds, and exchange-traded funds ("*ETFs*"), and/or annuity sub-accounts in accordance with the investment objectives of the client.

For assets not managed by Independent Managers, Total Financial provides two levels of service for non-workplace plans and for non-annuity accounts: Private Client Services ("*PCS*") and Efficient Allocation Portfolios ("*EAP*"). Total Financial's PCS services are utilized for accounts with numerous and diversified investments; while an EAP is typically reserved for more concentrated portfolios that hold substantially fewer positions and assets.

Total Financial also renders non-discretionary investment management services to clients relative to: (1) variable life/annuity insurance products that they may own (subject to the exception regarding clients who are residents of the State of California, as described below); (2) their individual Employer Retirement Plans through a consulting arrangement; (3) 529 plans; (4) group retirement plans; and/or (5) other financial and/or investment matters, services and/or programs as mutually agreed upon. In so doing, Total Financial either directs or recommends the allocation of client assets among the various investment options that are available. Client assets may be maintained at a specific insurance company or custodian designated by the product sponsor, the employer's retirement plan or program, or by the client, as the result of a prior insurance or investment purchase.

Total Financial tailors its advisory services to the individual needs of each client. Total Financial consults with clients initially and requests ongoing information to develop and maintain an Investment Policy Statement that identifies clients' risk tolerance, investment objectives, and strategic approach to investing; however, for discretionary accounts, Total Financial may reasonably deviate from the initial or current investment strategy and/or asset allocation, based upon economic or market conditions and/or other considerations.

Clients are advised to promptly notify Total Financial if there are changes in their financial situation, personal circumstances or investment objectives or if they wish to impose reasonable restrictions upon Total Financial's investment management services.

## **Use of Independent Managers**

As mentioned above, Total Financial may recommend that clients authorize the active discretionary management of all or a portion of their assets by Total Financial and/or among certain independent investment managers ("*Independent Managers*"), based upon the stated investment objectives of the client. The terms and conditions under which the client engages the Independent Managers are set forth in a separate written

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agreement between Total Financial and/or the client and the designated Independent Managers. Total Financial renders services to the client relative to the discretionary selection of Independent Managers. Total Financial also monitors and reviews the account performance in the context of the client's stated investment objectives and risk tolerance. Total Financial receives an annual advisory fee, which is based upon a percentage of the market value of the assets being managed by the designated Independent Managers.

When selecting an Independent Manager, Total Financial reviews information about the Independent Manager, such as material supplied by the Independent Manager or independent third parties. These materials provide a description of the Independent Manager's investment strategies, past performance and risk adjusted returns to the extent available. When recommending an Independent Manager, Total Financial considers the client's stated investment objectives and risk tolerance. Total Financial also considers the Independent Manager's approach to asset management, and whether it is an appropriate fit for the client. However, for discretionary accounts, Total Financial is granted the authority to deviate from the initial or current investment strategy and/or asset allocation and to change Independent Managers.

The investment management fees charged by the designated Independent Managers, together with the fees charged by the corresponding designated broker-dealer/custodian of the client's assets, may be exclusive of, and in addition to, Total Financial's investment advisory fee as set forth in the Agreement. As discussed above, the client may incur fees in addition to those charged by Total Financial, the designated Independent Managers, and corresponding broker-dealer/custodian.

In addition to Total Financial's written disclosure brochure, the client also receives the written disclosure brochure of the designated Independent Managers. Certain Independent Managers may impose more restrictive account requirements and varying billing practices than Total Financial. In such instances, Total Financial may alter its corresponding account requirements and/or billing practices to accommodate those of the Independent Managers.

Total Financial may also utilize certain turnkey asset management programs ("*TAMPs*"). The TAMP may provide Total Financial with back-office services as well as access to Independent Managers. The services provided by the TAMP may result in an additional fee to the client.

If Total Financial refers a client to an Independent Manager where Total Financial's compensation is included in the advisory fee charged by such Independent Manager and the client engages the Independent Manager, Total Financial shall be compensated for its services by receipt of a fee to be paid directly by the Independent Manager to Total Financial in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended, and any corresponding state securities laws, rules, regulations, or requirements. Any such fee is paid solely from the Independent Manager's investment management fee, and does not result in any additional charge to the client. However, the use of a TAMP as an advisory solution is generally more expensive to the client than non-TAMP advisory investments.

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## Use of Variable Annuities

In addition to the above advisory services, Total Financial may also be engaged by clients that seek discretionary advice about a variable annuity. Once engaged (subject to the exception regarding clients who are residents of the State of California, as described below), Total Financial will allocate the annuity assets among the various investment sub-accounts that comprise the variable annuity product. For such engagements, the client must accept that Total Financial's investment allocation choices are limited to the investment sub-accounts provided by the annuity product. Should the client elect a living benefit rider (such as a guaranteed living withdrawal benefit rider) the sub-account investment allocation choices will typically be severely restricted. *Total Financial includes the variable product assets as part of "assets under management" for the purposes of calculating its annual advisory fee.* The current advisory fee for such service is based upon the market value of the assets within the annuity at the end of each quarter and the advisory fee shall generally be .50% (50 basis points per year) paid quarterly in arrears.

## Use of Inverse/Enhanced Market Strategies

Total Financial may utilize long and short mutual funds and/or exchange traded funds that are designed to perform in either an: (1) inverse relationship to certain market indices (at a rate of 1 or more times the inverse [opposite] result of the corresponding index) as an investment strategy and/or for the purpose of hedging against downside market risk; and (2) enhanced relationship to certain market indices (at a rate of 1 or more times the actual result of the corresponding index) as an investment strategy and/or for the purpose of increasing gains in an advancing market. There can be no assurance that any such strategy will prove profitable or successful. In light of these enhanced risks/rewards, a client may direct Total Financial, in writing, not to employ any or all such strategies for his/her/their/its accounts.

## Rollovers to an IRA

Clients, and prospective clients, considering a rollover from a qualified employer sponsored workplace retirement plan ("Employer Retirement Plan") to an Individual Retirement Account ("IRA") are encouraged to consider and to investigate the advantages and disadvantages of an IRA rollover from their existing 401(k), 457, 403(b) or other qualified pension plan.

A plan participant leaving an employer typically has four options (and may engage in a combination of these options): 1) Leave the money in his former Employer Retirement Plan, if permitted; 2) Rollover the assets to his new employer's plan, if one is available and if rollovers are permitted; 3) Rollover Employer Retirement Plan assets to an IRA; 4) Cash out (or distribute) the Employer Retirement Plan assets and pay the taxes due. Regulatory authorities have advised investors that they may face increased fees when they transfer retirement savings from their current Employer Retirement Plan to an IRA rollover account. The regulators have advised investors that even if there are no costs associated with the IRA rollover itself, there will be costs associated to account administration, investment management or both. There may also be additional management expenses associated with the investment itself.

Total Financial manages investments for clients in advisory accounts and charges a fee to manage accounts. Therefore, in addition to the fees charged by Total Financial, the underlying investments (mutual fund, ETF,

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annuity, or other investment) typically also charge management fees. Custodial fees may also apply. Investing in an advised IRA with Total Financial will typically be more expensive than the current Employer Retirement Plan.

Prior to electing to rollover assets from the current Employer Retirement Plan to an IRA managed by Total Financial, listed below are some important considerations:

- The type of account investment management desired. For example, is assistance in the management of investments desired on a discretionary or non-discretionary basis; or is a self-managed account preferred.
- Available investment choices.
- The professional assistance available to participants in the *current Employer Retirement Plan* when compared to the advisory services offered by Total Financial in an advised IRA account.
- The cost of advisory fees.
- Management expenses associated with the underlying investments in an IRA advisory account vs. the underlying investment expenses associated with the *current Employer Retirement Plan*. Often, the management expenses in the *current Employer Retirement Plan* are less expensive than in a rollover IRA advisory account.
- Custodial charges in the advised IRA account vs. the *current Employer Retirement Plan*.
- Transaction charges associated with the advised IRA vs. the *current Employer Retirement Plan*.
- The rules pertaining to the required minimum distributions ("RMD") in the *current Employer Retirement Plan* when compared to the advised IRA.
- Legal protections afforded to *current Employer Retirement Plan* participants and to rollover IRA account owners. Employer Retirement Plans have significant liability protection.
- The rules pertaining to beneficiaries of an IRA vs. the *current Employer Retirement Plan* (inherited accounts).
- The loan provision associated with the current Employer Retirement Plan, if any. IRA accounts do not have loan provisions.
- Employer Retirement Plans that may be available from a new employer.
- There are numerous other considerations.

Clients and prospective clients are urged to seek advice from their CPA, tax adviser, the plan administrator and/or legal counsel prior to rolling over assets from the current Employer Retirement Plan to an advised IRA with Total Financial.

**Conflict of Interest:** The recommendation by Total Financial or any of its representatives that a Client, or prospective client, rollover assets from an Employer Sponsored Plan to an IRA managed by the adviser may present a conflict of interest. Total Financial and its representatives have an incentive to recommend an investor rollover plan assets into an IRA because Total Financial stands to earn an asset-based fee as a result, but no compensation if assets are retained in the plan. Clients are advised that they are under no obligation to rollover an Employer Sponsored Plan to an IRA with Total Financial as adviser. **Total Financial's Chief Compliance Officer, Joseph Piangozza, remains available to address any questions that a client or prospective client may have regarding the above potential conflict of interest.**



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## Use of Retirement Programs ("Plans")

Total Financial may also be engaged by Trustees of a workplace retirement plan to seek advice about a group retirement plan (i.e. a 401(k) Profit Sharing Plan). Total Financial currently utilizes Principal Financial ("Principal") and American Funds as the qualified group Plans of choice. Total Financial reserves the right to use additional 401(k) group plan service providers; including group plan service providers selected by the client. Assets held by the participants of a qualified group plan are self-directed by the participants and the Trustees are given advice on a non-discretionary basis.

## Additions and Withdrawals to Accounts

Clients may make additions to, and withdrawals from, their account at any time; subject to Total Financial's right to terminate any and all agreements. Clients may withdraw account assets on notice to Total Financial, subject to the usual and customary securities settlement procedures. However, Total Financial designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives.

**Please Note: California Clients:** For Total Financial's clients who are residents of the State of California, Total Financial will not charge a fee with respect to any advice or guidance provided to such a client regarding his/her/its interest or rights in an insurance contract. **Furthermore, affiliates of Total Financial do not sell commissioned insurance products in the State of California.**

## Item 5. Fees and Compensation

### Financial Planning and Consulting Fees

Total Financial may charge a fixed fee and/or hourly fee for financial planning and consulting services. These fees are negotiable, but generally range from \$600 to \$10,000 on a fixed fee basis, or \$250 on an hourly rate basis, depending upon the level and scope of the services and the professional rendering the financial planning and/or the consulting services. In some circumstances (i.e. where clients engage Total Financial for ongoing general consulting), Total Financial may charge an asset-based fee of up to 1% of the assets covered by the financial planning/consulting services; or an hourly fee; a quarterly fee; or a flat fee. Ongoing consulting fees are charged quarterly in advance, as stated in the Agreement. If the client engages Total Financial for additional investment advisory services, Total Financial may offset all or a portion of its fees for those services based upon the amount paid for recent financial planning and/or consulting services. Total Financial's financial planning and consulting fees are separate from any investment management fees and other charges, including but not limited to, commissions that Supervised Persons may have received for non-advisory business.

Prior to engaging Total Financial to provide financial planning and/or consulting services, the client is required to enter into a written agreement with Total Financial setting forth the terms and conditions of the engagement. Total Financial typically requires one-half of the financial planning/consulting fee (estimated hourly or fixed) payable upon entering the written agreement. The balance is generally due upon delivery of

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the financial plan, Investment Policy Statement, hypothetical illustration(s) containing recommendations, or upon the completion of the agreed upon services.

## **Investment Management Fee**

Total Financial provides investment advisory management services for an annual fee, based upon a percentage of the market value of the assets being managed by Total Financial. Total Financial's annual fee is exclusive of, and in addition to brokerage commissions, IAR transaction fees, custodian charges, 12b-1 fees on mutual funds and other related costs and expenses which are incurred by the client. Total Financial does not, however, receive any portion of these commissions, fees, and costs. Total Financial's annual fee is prorated and charged quarterly, in arrears, based upon the market value of the assets being managed by Total Financial on the last day of the previous quarter. The annual fee varies between 0.50% and 1.95%, depending upon the market value of the assets under management and the type of investment advisory management services to be rendered. Total Financial shall negotiate and charge a management fee based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client relationship, account retention, service requirements, referral sources etc.). The management advisory fee is stipulated in the Agreement.

## **Fees Charged by Financial Institutions**

As further discussed in response to Item 12 (below), Total Financial generally recommends that clients utilize the brokerage and clearing services of Pershing, LLC through Pershing Investment Manager Services ("*Pershing Advisor Solutions*") and/or AssetMark Financial Trust Company ("AssetMark FTC") for Investment Management accounts or other broker-dealers and custodians. As further disclosed below, Total Financial may also utilize AssetMark FTC, through its registered investment adviser AssetMark, Inc. ("AssetMark"), as an Independent Manager and/or TAMP for client assets. In addition, Principal may be utilized, to provide custodial and/or Third Party Administrator ("*TPA*") type services for Employer Retirement Plans (subject to the limitations imposed by Principal in its agreement with the client).

Total Financial may only implement its investment management recommendations after the client has arranged for and furnished Total Financial with all information and authorization regarding accounts with appropriate Financial Institutions. Financial Institutions include, but are not limited to, Pershing, AssetMark, American Funds (The Capital Group), Principal, Lockwood Financial, LLC ("*Lockwood*"), Vanguard and any other broker-dealer, custodian, and/or Financial Institution recommended by Total Financial or directed by the client. Other Financial Institutions may include trust companies, banks, mutual funds (all institutions referenced are herein collectively referred to as "*Financial Institutions*").

Clients may incur certain charges imposed by the Financial Institutions and other third parties such as fees charged by Independent Managers (as defined below), by a TAMP, custodial fees, early redemption fees, charges imposed directly by a mutual fund, ETF or annuity in the account, which is disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), custodial fees, early redemption fees deferred sales charges, annuity rider fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, account closure fees

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and other fees and taxes on brokerage accounts and securities transactions. Additionally, for assets outside of any wrap fee programs, clients may incur brokerage commissions and transaction fees. Such charges, fees and commissions are exclusive of, and in addition to, Total Financial's fee. None of the charges imposed by the Financial Institutions are paid to Total Financial as an additional fee or commission. Total Financial is only compensated for advisory services rendered.

Total Financial's Agreement and the separate agreement with a Financial Institution generally authorize Total Financial, Independent Managers, and/or a TAMP to debit the client's account for the amount of Total Financial's fee and to directly remit that management fee to Total Financial or the Independent Managers. Any custodian recommended by Total Financial has agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account, including the amount of management fees paid directly to Total Financial. Principal lists the quarterly fees as "Deducted Fees".

The client may authorize Total Financial to debit a different non-qualified account for the amount of Total Financial's fee, in accordance with the Agreement. Such authorization must be in writing and is typically included in the Agreement.

## **Fees for Management During Partial Quarters of Service**

For the initial period of investment management services, the fees shall be calculated on a pro-rata basis. The Agreement between Total Financial and the client will continue in effect until terminated by either party pursuant to the terms of the Agreement. Total Financial's fees are prorated through the date of termination and any remaining balance is charged or refunded to the client, as appropriate.

Additions may be in cash or securities, provided that Total Financial reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. Total Financial may consult with its clients about the options and ramifications of transferring securities. However, clients are advised that when transferred securities are liquidated, they are subject to brokerage charges, transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and that investment liquidations will have income tax ramifications.

If assets are deposited into or withdrawn from an existing account after the inception of a quarter, the fee payable with respect to such assets will not be adjusted or prorated based on the number of days remaining in the quarter. Upon notification that an advisory account is to be closed, and/or the assets are being transferred by the client, then Total Financial will charge the agreed advisory fee on a pro-rata basis.

Total Financial does not receive commissions on investment advisory accounts. However, if a commission-based client later becomes an advisory client, Total Financial may offer a fee forgiveness program. The fee forgiveness program is not applicable to 12b-1 fees, Class C share commissions paid, insurance commissions, annuity trail commissions and/or any other trail commission payment that may have been received by a Supervised Person. Fee forgiveness is subject to the discretion of Total Financial and is not a part of the Agreement. Total Financial does not charge an advisory fee and commission on the same asset.

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## Item 6. Performance-Based Fees and Side-by-Side Management

Total Financial does not provide any services for performance-based fees. Performance-based fees are those fees based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7. Types of Clients

Total Financial provides its services to individuals, pension plans, defined benefit plans, profit sharing plans and/or other qualified plans, trusts, estates, corporations and business entities. Total Financial reserves the right to offer its services to any person or entity as allowed by law.

### Minimum Account Size

Total Financial reserves the right to impose a minimum portfolio size of \$250,000 for new and existing clients. Total Financial, in its sole discretion, may accept clients with smaller portfolios based upon certain criteria including referral source, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client relationship, account retention, referral source, and pro-bono activities. Total Financial shall only accept clients with less than the minimum portfolio size if, in the sole opinion of Total Financial, the smaller portfolio size will not cause a substantial increase of investment risk beyond the client's identified risk tolerance. Total Financial may aggregate the portfolios of family members to meet the minimum portfolio size, or waive the minimum portfolio size on a case by case basis. Additionally, certain Independent Managers may impose more restrictive account requirements and varying billing practices than Total Financial. In such instances, Total Financial may alter its corresponding account requirements and/or billing practices to accommodate those of the Independent Managers.

## Item 8. Methods of Analysis, Investment Strategies and Risk of Loss

### Methods of Analysis and Investment Strategies

Total Financial constructs client portfolios based on the principles of goal-oriented planning and diversification, in accordance with clients' personal goals, experience, time horizon and risk tolerance. Diversification is sought at the security (e.g., multiple stocks and bonds), asset class (e.g., large-cap stocks, small-cap stocks, international stocks, government bonds, high-yield bonds, international bonds, etc.), and asset allocation approach (strategic, tactical, absolute return) levels.

Client assets are managed either directly by Total Financial or through the use of Independent Managers. When accounts are managed directly by Total Financial, it is through its proprietary PCS or EAP programs; or by using an annuity account; or through the use of a qualified group retirement plan platform provided by a third party. Employer Retirement Plans that are employee directed are typically non-discretionary accounts.

For asset allocation purposes, Total Financial may use multiple Independent Managers, each having a unique risk exposure and investment strategy. The Independent Managers may implement the portfolios in ways

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that hedge against each other (i.e. one may include long-only fixed income positions, while another may contain inverse fixed-income exposure), while at other times Independent Managers may converge when they believe a strong opportunity exists in a given asset class or sector. In both circumstances, Total Financial's process leads it to utilize Independent Managers with asset allocation approaches that it believes are appropriate for the client and which possess the tools and capabilities to execute its strategy. For some clients, one Independent Manager may be sufficient to satisfy the asset allocation needs of the portfolio, while adhering to the client's risk tolerance.

For accounts managed directly by the Adviser, Total Financial will generally implement its strategies with mutual funds or exchange-traded funds ("ETFs") that meet its criteria at the time of implementation. Certain clients may opt to maintain specific legacy positions as part of their account; or may opt for the purchase of specific securities to be held in their advisory account. Such positions will be monitored and reviewed by Total Financial, recommendations will be made by the adviser, and legacy positions will be monitored and reported to the client on the quarterly statement.

## ***Independent Managers***

When utilizing Independent Managers, Total Financial starts with distinct approaches to asset allocation. Within each approach, Total Financial identifies third-party strategists that it believes have the capability to execute a given strategy and bring value to the portfolio construction process. When performing due diligence on an Independent Manager and a target strategy, Total Financial considers many factors, including the historical risk/return characteristics of the strategy, the longevity of the strategy, and market conditions during its lifespan; the degree of tracking error and manager flexibility built into the strategy, and whether such flexibility is desired; the asset base and financial stability of the Independent Manager, the longevity of the management team with the Independent Manager, the assets implemented in the target strategy; the size of the management team working on the strategy; the research capabilities of the strategist firm; the strategist's process for researching and selecting securities for implementation; and how the target strategy compares in different capital market environments, as compared to other strategists with similar asset allocation objectives.

After determining which Independent Managers are to be used within each approach to asset allocation, Total Financial decides the weight to apply to each of the Independent Managers. The target weight varies depending upon market conditions, operational constraints, and the risk/return profile of the client, among other considerations.

## ***PCS and EAP Accounts***

PCS and EAP accounts are managed directly by Total Financial, based on the risk/return profile of the client that is determined when the account is established; and thereafter. Trades within PCS and EAP accounts are executed by Total Financial in accounts held at Pershing, LLC (Pershing Advisor Solutions). Total Financial develops a set of model portfolios that provide a starting point for portfolio construction; but actual client portfolios are frequently unique to the client and may be customized based on the specific needs, goals, objectives and the stated risk tolerance of the client.

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The target asset allocation for each model portfolio shows how assets will be divided between each asset class (equities, fixed income, cash), and between many sub-asset classes, (large-cap stocks, small-cap stocks, investment grade bonds, international bonds, etc.). For PCS and EAP accounts, Total Financial follows a strategic asset allocation approach for most of the assets included in each client's account (i.e., the "core" of the portfolio). For each profile, the target asset allocation is expected to show only incremental change over time, while some tactical adjustment is allowed. Target allocations may be modified in the implementation of a client's portfolio for several reasons, including reasonable restrictions requested by the client, capital markets outlook and related tactical considerations, tax considerations, and the inclusion of alternative asset classes, as appropriate.

Core positions are designed to provide investors with the appropriate exposure to the target asset class. This type of approach is frequently referred to as a "relative return" strategy. Core positions will generally consist of index, index-plus, or mutual funds and ETFs with a high correlation to its asset class. Core positions generally have a large number of holdings to effectively diversify away firm-specific risk while maintaining exposure to market risk. The more liquid and efficiently priced the asset class, the larger the emphasis placed on maintaining passive positions.

Satellite positions are designed to provide investors with either a hedge to market risk (risk mitigation), or may have the potential to provide additional alpha (risk-adjusted excess return). Total Financial may seek investments that are temporarily mispriced, or may locate investment managers (including mutual fund managers) that have a track record of identifying such investment opportunities. Satellite positions will primarily be implemented via actively managed mutual funds or with ETF's. Total Financial does not limit itself to one specific discipline or investment approach when choosing a satellite fund (e.g. sector rotation, technical analysis, deep-discount, earnings growth, etc.), but seeks to find a management team with a track record of consistently applying their investment discipline with successful historic results.

## ***Employer Retirement Plans***

When the assets are part of an Employer Retirement Plan (such as with Principal or American Funds), Total Financial will recommend a menu of available securities to the plan trustees, based on its due diligence. Recommendations made by Total Financial to the plan trustees of a group retirement plan are made on a non-discretionary basis. Total Financial provides services to the plan participants that are educational in nature.

## **Risk of Loss**

### *Mutual Funds, ETFs, and Annuities*

An investment in a mutual fund (including a money market fund), ETF, or annuity sub-account involves risk, including the loss of principal. When evaluating the risk associated with a particular mutual fund, ETF and/or annuity sub-account, an investor should refer to the applicable prospectus.

As disclosed above, Total Financial may utilize long and short mutual funds and/or exchange traded funds that are designed to perform in either an: (1) inverse relationship to certain market indices (at a rate of 1 or more

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times the inverse [opposite] result of the corresponding index) as an investment strategy and/or for the purpose of hedging against downside market risk; and (2) enhanced relationship to certain market indices (at a rate of 1 or more times the actual result of the corresponding index) as an investment strategy and/or for the purpose of increasing gains in an advancing market. There can be no assurance that any such strategy will prove profitable or successful. A client may direct Total Financial, in writing, not to employ any or all such strategies for his/her/their/its accounts.

## ***Market Risks***

The profitability of a significant portion of Total Financial's recommendations may depend to a great extent upon correctly assessing the future course of price movements of stocks and bonds. There can be no assurance that Total Financial will be able to accurately predict those price movements. Diversification does not remove market risk or the possibility of principal loss.

Please Note: Past performance may not be indicative of future results. Different types of investments involve varying degrees of risk. Therefore, it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended and/or undertaken by Total Financial Advisors, LLC), or any non-investment related services, will be profitable, equal any historical performance level(s), be suitable for your portfolio or individual situation, or prove successful. Total Financial Advisors, LLC is neither a law firm nor accounting firm, and no portion of its services should be construed as legal or accounting advice. Please remember that it remains your responsibility to advise Total Financial Advisors, LLC, in writing, if there are any changes in your personal/financial situation or investment objectives for the purpose of reviewing/evaluating/revising our previous recommendations and/or services or if you would like to impose, add, or to modify any reasonable restrictions to our investment advisory services.

Total Financial may recommend the use of Independent Managers for certain clients. Total Financial will continue to conduct ongoing due diligence of such managers and monitor their performance. Total Financial's recommendations rely, to a great extent, on the Independent Managers ability to successfully implement their investment strategy. In addition, Total Financial does not have the ability to supervise the Independent Managers on a day-to-day basis, if at all. The use of Independent Managers does not ensure a successful investment outcome. The past performance of an Investment Manager, or the strategy implemented by the Investment Manager, is not a guarantee of future results.

## ***Management Through Similarly Managed Accounts***

For PCS and EAP clients, Total Financial generally manages portfolios by allocating portfolio assets among various securities on a discretionary basis, using one or more of its proprietary investment strategies (collectively referred to as "*Investment Strategy*"). In so doing, Total Financial buys, sells, exchanges and/or transfers securities based upon the Investment Strategy.

Total Financial's management using the Investment Strategy, complies with the requirements of Rule 3a-4 of the

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Investment Company Act of 1940, as amended. Rule 3a-4 provides similarly managed accounts, such as the Investment Strategy, with a safe harbor from the definition of an investment company.

Securities in the Investment Strategy are usually exchanged and/or transferred based on factors other than a client's individual tax ramifications. Total Financial is primarily focused on total return; tax sensitivity is secondary unless specified as a requirement in the client's Investment Policy Statement and/or in the Agreement. Certain investment opportunities that become available to Total Financial's clients may be limited to clients that have a primary focus on tax minimization. As further discussed in response to Item 12 (below), Total Financial allocates investment opportunities among its clients in a fair and equitable basis.

## *Additional Risks Related to ETFs*

Total Financial may implement an investment strategy by using, in whole or in part, Exchange Traded Funds ("ETFs"). The market value of an ETF's shares may differ from its net asset value ("NAV"). This difference in price may be due to the fact that the supply and demand in the market for ETF shares at any point in time is not always identical to the supply and demand in the market for the underlying basket of securities.

Accordingly, there may be times when an ETF trades at a premium (creating the risk that the fund pays more than NAV for an ETF when making a purchase) or discount (creating the risk that the fund's NAV is reduced for undervalued ETFs it holds, and that the fund receives less than NAV when selling an ETF).

## *General Risk of Loss*

Investing in securities involves the risk of loss of principal. Clients should be prepared to bear such loss.

## **Item 9. Disciplinary Information**

Total Financial is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of its management. Total Financial does not have any required disclosures to this Item.

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

Total Financial is required to disclose any relationship or arrangement that is material to its advisory business or to its clients. Total Financial has described such relationships and arrangements below.

### **Receipt of Insurance Commissions**

Total Financial is under common control with Total Financial Systems, Inc. ("TFS"), a duly licensed insurance agency. Certain of Total Financial's Supervised Persons, in their individual capacities, are also licensed insurance agents with TFS and directly with various insurance companies; and in such capacity, may recommend, on a fully-disclosed commission basis, the purchase of certain insurance products (subject to the exception regarding



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clients who are residents of the State of California in item 4 above). While Total Financial does not sell insurance products itself, Total Financial does permit its Supervised Persons, in their individual capacities as licensed insurance agents, to sell insurance products to its investment advisory clients. A conflict of interest may exist to the extent that Total Financial recommends the purchase of insurance products where Total Financial's Supervised Persons and/or Total Financial Systems Inc. receives insurance commissions or other additional compensation. Total Financial does not charge an investment advisory fee when a commission is being received by its Supervised Persons for insurance products sold.

**Conflict of Interest:** The recommendation by Total Financial or any of its representatives that a client purchase a commissioned insurance product may present a conflict of interest, as the receipt of commissions may provide an incentive to recommend commission products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Total Financial's Supervised Persons. Clients are reminded that they may purchase insurance products recommended by Total Financial and its representatives through other, non-affiliated insurance agents. **Total Financial's Chief Compliance Officer, Joseph Piangozza, remains available to address any questions that a client or prospective client may have regarding the above potential conflict of interest.**

## **Fees from Independent Managers**

As discussed above, Total Financial recommends that certain clients authorize the active discretionary management of a portion of their assets by and/or among certain Independent Managers. In particular, when Total Financial recommends the use of the AssetMark TAMP, the percentages set forth in the fee schedule are inclusive of both AssetMark's program fee and Total Financial's fee. The portion of the total management fee that is allocated to Total Financial may vary, depending on the investment option(s) chosen. If there is a change in the investment option(s) chosen for all or a portion of the assets, the percentage of the total management fee allocated to Total Financial may change. The selection of a particular strategy and/or strategists within AssetMark may impact the net fee retained by Total Financial. A potential conflict of interest exists when Total Financial selects a strategy and/or strategist that increases the net fee retained by Total Financial. **Total Financial's Chief Compliance Officer, Joseph Piangozza, remains available to address any questions that a client or prospective client may have regarding the above potential conflict of interest.**

## **Additional Business Relationships with Independent Managers**

Total Financial is also part of AssetMark's Premier Consultant Program ("*Program*") and receives a Business Development Allowance ("BDA") from AssetMark. It is through the Program and BDA that advisers are able to receive reimbursement for certain marketing, advertising, client events, and practice development expenses. Total Financial is also invited to attend periodic AssetMark sponsored meetings and educational conferences. The total allowance Total Financial receives from AssetMark will vary depending on the amount of assets under management that Total Financial places on AssetMark's TAMP. As such, Total Financial has an incentive to utilize AssetMark's TAMP. Before placing any client assets with AssetMark's TAMP, Total Financial evaluates the service offering of AssetMark, including the Independent Managers available through AssetMark's TAMP. A conflict of interest may exist to the extent that Total Financial recommends the purchase of AssetMark's TAMP and receives Program allowances; and Total Financial's Supervised Persons are invited to attend periodic AssetMark sponsored

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meetings and educational conferences. **Total Financial's Chief Compliance Officer, Joseph Piangozza, remains available to address any questions that a client or prospective client may have regarding the above potential conflict of interest.**

## Item 11. Code of Ethics

Total Financial and persons associated with Total Financial ("*Associated Persons*") are permitted to buy or sell securities that it also recommends to clients, consistent with Total Financial's policies and procedures. Total Financial has adopted a Code of Ethics that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws ("*Code of Ethics*").

In accordance with Section 204A of the Investment Advisers Act of 1940 (the "*Advisers Act*"), its Code of Ethics contains written policies reasonably designed to prevent the unlawful use of material non-public information by Total Financial or any of its associated persons.

Total Financial and its Supervised Persons and "Access Persons" may buy or sell securities that are also recommended to clients. This practice may create a situation where the Supervised Persons and/or Access Persons of Total Financial are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if Total Financial did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of Total Financial's clients) and other potentially abusive practices.

Total Financial has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of Total Financial's Access Persons. Total Financial's securities transaction policy requires that an Access Person of Total Financial must provide the Chief Compliance Officer or his/her designee with a written report of the current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date Total Financial selects.

Total Financial and/or Supervised Persons and Access Persons of Total Financial may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where the Supervised Persons and/or Access Persons of Total Financial are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above Total Financial has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Total Financial's Access Persons. Clients and prospective clients may contact Total Financial to request a copy of its Code of Ethics.

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## Item 12. Brokerage & Custody Services

As discussed herein, Clients select the broker-dealer and custodian (collectively "custodian(s)") for their account. Total Financial generally recommends that clients utilize the brokerage, clearing and/or custodial services of certain broker-dealers and custodians including; Pershing, AssetMark and others. Although the Firm may recommend that clients establish accounts with certain custodians, it is the client's decision where to custody their assets.

Factors which Total Financial considers in recommending custodians to clients include their respective financial strength, reputation, execution, pricing, research capability, services provided, expertise, product availability, and/or access to TAMP and TAMP strategies. Generally, the recommended custodians enable Total Financial to obtain many mutual funds, ETF's and individual securities without transaction charges or with nominal transaction charges. The commissions, transaction fees, and/or internal fees charged by recommended custodians may be higher or lower than those charged by other Financial Institutions.

Brokerage commissions paid by Total Financial's clients comply with Total Financial's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Total Financial seeks competitive rates, but may not necessarily obtain the lowest possible commission rates for client transactions. Total Financial does not share in commissions charged by a custodian for brokerage services.

Total Financial periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

The client may direct Total Financial in writing to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution, and Total Financial will not seek better execution services or prices from other Financial Institutions or be able to "batch" client transactions for execution through other Financial Institutions with orders for other accounts managed by Total Financial (as described below). As a result, the 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. Subject to its duty of best execution, Total Financial may decline a client's request to direct brokerage if, in Total Financial's sole discretion, such directed brokerage arrangements would result in additional operational difficulties or violate restrictions imposed by other broker-dealers (as further discussed below).

Transactions for each client generally will be effected independently, unless Total Financial decides to purchase or sell the same securities for several clients at approximately the same time. Total Financial may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among Total Financial's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated

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among Total Financial's clients pro-rata to the purchase and sale orders placed for each client on any given day. To the extent that Total Financial determines to aggregate client orders for the purchase or sale of securities, including securities in which Total Financial's Supervised Persons may invest, Total Financial shall generally do so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. Total Financial shall not receive any additional compensation or remuneration as a result of the aggregation. In the event that Total Financial determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro-rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, Total Financial may exclude the account(s) from the allocation; the transactions may be executed on a pro-rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

## **Software and Other Services Provided by Financial Institutions**

Total Financial may receive from custodians, without cost to Total Financial, research, computer software, related systems support, and other services which allow Total Financial to better manage and monitor client accounts. Total Financial may receive these services without cost because Total Financial renders investment management services to clients who maintain assets with the custodian. The software and related systems support may benefit Total Financial, but not its clients directly. Other support may include the preparation of statements or on-line statement access. Services generally will be used for the benefit of all Total Financial's clients but services may not benefit all clients equally. In fulfilling its duties to its clients, Total Financial endeavors at all times to put the interests of its clients first. Clients should be aware, however, that Total Financial's receipt of economic benefits from a broker-dealer, custodian, TAMP and/or Financial Institution creates a potential conflict of interest, since these benefits may influence Total Financial's choice of one broker-dealer and/or Financial Institution over another. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a potential conflict of interest because Total Financial does not have to pay for the products or services provided.

Total Financial may receive the following benefits from custodians: Monetary support for portfolio management technology and other consulting needs; receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its registered investment adviser participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry, reporting, and account information.

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Total Financial may also receive other economic benefits in the form of monetary support for client appreciation dinners, client seminars, educational conferences and meetings and related materials sponsored by various Financial Institutions, including but not limited to custodians, broker-dealers, mutual funds, TAMP providers, insurance and annuity companies and other vendors. Total Financial may also receive monetary support and business development allowances for technology, investment research, marketing and advertising from these entities, as well as monetary support and/or guest speakers for client events. Clients are advised that a potential conflict of interest exists to the extent that Total Financial recommends products from these Financial Institutions or other vendors. However, the client is under no obligation to purchase these products, and Total Financial does not receive any other form of compensation from Financial Institutions and/or vendor for these matters other than as set forth herein.

**Total Financial's Chief Compliance Officer, Joseph Piangozza, remains available to address any questions that a client or prospective client may have regarding the above potential conflict of interest.**

## Item 13. Review of Accounts

For those clients to whom Total Financial provides investment management services, Total Financial monitors those portfolios as part of an ongoing process. For those clients to whom Total Financial provides financial planning and/or consulting services, client reviews are conducted on an "as needed" or "as requested" basis unless the Agreement specifies otherwise.

Internal reviews are conducted by members of Total Financial's Investment Policy Committee on at least a quarterly basis. Clients are entitled to an in-person portfolio review or telephone conference with a member of Total Financial's Investment Policy Committee upon request, but Total Financial may limit this to a semiannual basis during the normal hours of business operation at Total Financial. All investment advisory clients are encouraged to discuss their needs, goals, and life's circumstances with Total Financial and to keep Total Financial informed of any changes thereto. Total Financial shall contact ongoing investment advisory clients at least annually to request that the clients schedule an appointment and/or conference call to review their portfolio, as necessary.

Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular summary account statements ("reports") directly from the broker-dealer, custodian and/or Financial Institution. The delivery of an account report may be either electronic or via the delivery of a paper report. Should there be a discrepancy between a report issued by Total Financial and a report issued by a Financial Institution, the client is hereby advised that the report issued by the Financial Institution supersedes that of Total Financial. Those clients to whom Total Financial provides investment advisory services will also receive a report from Total Financial that may include relevant account and/or market-related information such as an inventory of account holdings and account performance. Principal electronically reports client assets on a quarterly basis, directly to the plan trustees and participants.

The Financial Institutions recommended by Total Financial send a physical or electronic statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid. In addition, Total Financial also sends periodic supplemental reports to certain clients. Total Financial's reports do

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not include self-directed investments or disbursements for Advisory fees when assets are held in a 401(k) or 401(k) Profit Sharing Plan ("PSP"); including those assets held at Principal in a 401(k) PSP. Clients are advised to review the reports from the applicable Financial Institution to monitor their advisory fees, available investment choices and performance. Total Financial does not send supplemental reports to plan participants in Employer Retirement Plans. In this instance, plan participants shall receive a statement from the respective custodian or Third Party Administrator ("TPA").

Those clients to whom Total Financial provides financial planning and/or consulting services will receive reports from Total Financial summarizing its analysis and conclusions as requested by the client or otherwise agreed to in writing by Total Financial. The client is responsible for implementation of the recommendations.

**Please Note:** Supplemental reports and/or statements provided by Total Financial are provided on a household basis, rather than on an account basis, unless the client has notified the adviser in writing to the contrary.

## Item 14. Client Referrals and Other Compensation

As referenced in Item 12.A.1 above, Total Financial may receive an indirect economic benefit from certain broker dealers and custodians. Total Financial, without cost (and/or at a discount), may receive support services and/or products from its broker dealers/custodians and other financial institutions.

Total Financial's clients do not pay more for investment transactions effected and/or assets maintained with a custodian as a result of this arrangement. There is no corresponding commitment made by Total Financial to any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

Total Financial does not compensate, directly or indirectly, any person, other than its Advisors, for client referrals.

**Total Financial's Chief Compliance Officer, Joseph Piangozza, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest any such arrangement may create.**

## Item 15. Custody

Total Financial does not maintain physical possession of client cash or securities. Cash and securities are maintained at a qualified custodian within the meaning of the Advisers Act. Total Financial's Agreement and/or the separate agreement with any Financial Institution may authorize Total Financial through such Financial Institution to debit the client's account for the amount of Total Financial's fee and to directly remit that management fee to Total Financial in accordance with applicable custody rules. Total Financial is deemed to have custody of client assets (as defined by the Advisers Act) as a result of these direct fee deduction arrangements.

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**Please Note:** To the extent that Total Financial provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by Total Financial with the account statements received from the account custodian. In the event of a discrepancy between a statement received from a custodian, and a statement prepared by Total Financial, the statement from the custodian shall prevail. Unless the client directs Total Financial to the contrary, in writing, any statements provided by Total Financial shall be provided on a household basis rather than on an account basis. **Please Also Note:** The account custodian does not verify the accuracy of the Total Financial's advisory fee calculation.

## Item 16. Investment Discretion

Total Financial may be given the authority to exercise discretion on behalf of clients. Total Financial is considered to exercise investment discretion over a client's account if it can effect transactions for the client without first having to seek the client's consent. Total Financial is given this authority through a power-of-attorney included in the agreement between Total Financial and the client. Clients who engage Total Financial on a discretionary basis may, at any time, impose restrictions, **in writing**, on the discretionary authority of Total Financial (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe the Total Financial's use of margin, etc.). Total Financial takes discretion over the following activities:

- The securities to be purchased or sold;
- The quantity of securities to be purchased or sold;
- When transactions are made;
- The Independent Managers to be hired or fired;
- Changes to asset allocation for a discretionary account.

Clients desiring to communicate with Total Financial should be aware that (1) trades are not accepted via voice-mail, and (2) e-mail communications concerning portfolio allocating, trading, and/or strategic changes or alterations must be verified with Total Financial. (3) Wire orders are not accepted via voice-mail or e-mail. (4) Third-party wire orders are not accepted by Total Financial.

## Item 17. Voting Client Securities

Total Financial is required to disclose if it accepts authority to vote client securities. Total Financial does not vote client securities on behalf of its clients. Clients will receive their proxies or other solicitations directly from their custodian.

## Item 18. Financial Information

Total Financial does not require or solicit the prepayment of more than \$1,200 in fees, six months or more in advance. In addition, Total Financial is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. Total Financial has no disclosures pursuant to this Item.

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**ANY QUESTIONS: Total Financial's Chief Compliance Officer, Joseph Piangozza, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.**



**Total Financial Advisors, LLC**  
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Registration does not imply any level of skill or training