

TCG FINANCIAL SERVICES, LLC

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This brochure provides information about the qualification and business practices of TCG Financial Services, LLC. If you have any questions about the contents of this brochure, please contact TCG Financial Services, LLC. 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 TCG Financial Services, LLC is also available on the Internet at www.advisorinfo.sec.gov.

TCG Financial Services, LLC is a Registered Investment Advisor. Registration as an Investment Advisor does not imply a certain level of skill or training.

Item 2 - Material Changes

On July 28, 2010, the United States Securities and Exchange Commission (“SEC”) adopted amendments to Form ADV and the rules concerning delivery of brochures to clients of registered investment advisers. This Brochure, dated December 31, 2015 is an amended document to the initial document dated February 16, 2011 as according to the SEC’s new requirements and rules. As such, this amended document contains materially new information that our initial brochure, dated February 16, 2011, did not include.

While TCG Financial Services, LLC initial business plan focused on diversifying our investment client’s funds into multiple FDIC insured banks (Certificates of Deposits & Money Market accounts) in amounts not to exceed the maximum FDIC insurance per bank thus guaranteeing large institutional investors the FDIC insurance, in 2014 the company’s business plan focus expanded to include the formation of a family of U.S. Money Market Funds by creating ten (10) individual Trusts each having one (1) Fund each with five (5) separate classes. In 2015, the Investment Advisor of each Trust, TCG Financial Services relinquished its Management Services Agreement to Catalyst Capital Advisors LLC and therefore is no longer the investment advisor of the TCG Funds.

In the future, this Item will discuss material changes, if any, made to this Brochure as part of our annual update.

A summary of any materials changes to this and subsequent Brochures will be provided to you within 120 days of the close of our business’ fiscal year. We may also provide you with additional updates or other disclosure information at other times during the year in the event of any material changes to our business.

You may request the most recent version of this brochure by contacting Vivian Coloma at 305-461-6090 or vivian@tcg-financial.com.

The following material changes have been reflected in this Brochure and are changes from our prior Brochure.

- **Item 4 was amended to reflect current assets under management**
- **Item 7 was amended to reflect the types of clients**

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Item 4 - Advisory Business

TCG Financial Services, LLC was established in 2010. The advisory firm was established to provide investment advisory services to investors looking to invest in a fixed income portfolio consisting of FDIC-insured deposits. In addition the advisory firm works with FDIC-insured financial institutions looking to attract deposits. Vivian Coloma, and Vivian Coloma, as the sole Trustee of the Coloma Family Trust, are the sole owners of TCG Financial Services, LLC.

Investment advisory services offered by TCG Financial Services, LLC to its individual customers may be comprehensive or limited in scope according to a customer's needs. TCG Financial Services, LLC's comprehensive service involves an assessment of the customer's needs in the way of cash flow, asset liability management, liquidity, risk control, diversification, tax concerns and other factors.

The client can determine to engage TCG Financial Services, LLC to provide discretionary or non-discretionary investment management services on a fee-only basis. The client may impose restrictions on investing in certain types of securities.

TCG Financial Services, LLC manages approximately \$185 million all on a non-discretionary basis. TCG Financial Services, LLC does not manage any funds on a discretionary basis.

Throughout this brochure, we disclose a number of conflicts of interest and provide summaries of a number of our policies and procedures designed to detect and address these conflicts and others. We encourage Fund investors, Clients and prospective clients to review our policies and procedures and inquire directly with us about our conflicts. Our compliance policies and procedures are available for review in our offices. In addition, conflicts of interest and specific risks are identified in the offering materials of Funds that we manage. Please request a copy of the relevant Fund's most current offering materials for a description of other conflicts and risks that might exist.

Item 5 - Fees and Compensation

The client can determine to engage TCG Financial Services, LLC to provide non-discretionary investment management services on a fee-only basis in accordance with the following schedule:

Market Value	Annual Fee
Up to \$999,999	1.25%
\$1,000,000 to \$1,999,999	1.00%
\$2,000,000 to \$2,999,999	0.90%
\$3,000,000 to \$3,999,999	0.80%
\$4,000,000 to \$4,999,999	0.70%
\$5,000,000 or greater	0.60%

TCG Financial Services, LLC's annual investment management fee is prorated and charged quarterly, in advance, based upon the average market value of the assets of the previous month. TCG Financial Services, LLC generally requires a minimum account size of \$1,000,000. However, TCG Financial Services, LLC, at its sole discretion, may reduce its account minimum, and charge a lesser investment management fee based upon certain criteria (i.e. anticipated future earning capacity, related accounts, negotiations, etc.).

The advisory fees discussed above include payment for investment advisory advice from TCG Financial Services, LLC only. The fee does not include mark-ups, markdowns, or payment of brokerage commissions, other transaction costs, or custodial fees. It also does not include management or other fees imposed by the investment companies. Such brokerage commissions, mark-ups or markdowns, and other costs are charged to the funds in addition to the advisory fee. Any accounts that are managed directly at the TCG Financial Series Trust funds will be charged on the total balance in the TCG Financial Series Trust fund at the end of the month.

Either party, without the payment of penalty, may terminate the advisory agreement in accordance with the written agreement. Upon such termination, any unpaid fees for services received by the client are due and immediately payable to TCG Financial Services, LLC.

TCG Financial Services, LLC representatives may, from time to time, recommend investment products to clients, including mutual funds, sponsored by TCG Financial Services, LLC. TCG Financial Services, LLC and its representatives may also recommend portfolios including proprietary funds to current and prospective clients. TCG Financial Services, LLC representatives may have a financial incentive to recommend proprietary funds over other funds, programs or services which may be available. TCG Financial Services, LLC and its representatives may have a conflict of interest when assisting clients in selecting these investment services and products, because the owners of the related companies may receive more aggregated compensation if the client selects products or services managed or offered through TCG Financial Services, LLC and its affiliates.

Clients have the option to purchase investment products that TCG Financial Services, LLC recommends through other brokers or agents that are not affiliated with TCG Financial Services, LLC.

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

TCG does not manage any accounts on the basis of a performance-based fee or side by side management arrangements.

Item 7 - Types of Clients

TCG Financial Services, LLC generally provides investment advice to investment companies, trusts, pension plans, institutions and corporations.

TCG Financial Services, LLC requires a minimum account size of \$1,000,000 for

separately managed accounts. Minimums may be waived due to business considerations or account relationships at the sole discretion of TCG Financial Services, LLC's management.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

As noted above, TCG provides Investment Advisory services for separately managed accounts, in accordance with the investment strategy outlined below.

TCG Financial Services, LLC's unique service involves an assessment of the customer's needs in the way of cash flow, asset liability management, liquidity, risk control, tax concerns and other factors. The selection of investment vehicles is subsequently determined by the portfolio manager and primarily includes FDIC insured instruments.

The general investment objective is to achieve preservation of capital, current income, liquidity and stability of principal. TCG Financial Services seeks to achieve this objective through the investment of client funds in low risk FDIC insurance accounts.

Item 9 - Disciplinary Information

Form ADV Part 2 requires investment advisers such as TCG Financial Services, LLC to disclose legal or disciplinary events involving the firm or our officers, or principals that are material to your evaluation of our advisory business or the integrity of our management. At this time, we have no information to report that is applicable to this item.

Item 10 - Other Financial Industry Activities and Affiliations

There are no activities or affiliations to report.

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

TCG Financial Services, LLC has adopted a Code of Ethics (the "Code") to address securities-related conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes TCG Financial Services, LLC's policies and procedures developed to protect client's interests in relation to the following topics:

- The duty at all times to place the interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the code of ethics and to avoid any actual or potential conflict of interest or any abuse of an employee's position of trust and responsibility;
- The principle that investment advisor personnel should not take inappropriate advantage of their positions;
- The fiduciary principle that information concerning the identity of security

holdings and financial circumstances of clients is confidential; and

- The principle that independence in the investment decision-making process is paramount. TCG Financial Services, LLC provides a copy of the Code to any client or prospective client upon request.

TCG representatives may, from time to time, recommend investment products to clients, including mutual funds, sponsored by TCG. TCG and its representatives may also recommend portfolios including proprietary funds to current and prospective clients. TCG representatives may have a financial incentive to recommend proprietary funds over other funds, programs or services which may be available. TCG and its representatives may have a conflict of interest when assisting clients in selecting these investment services and products, because the owners of the related companies may receive more aggregated compensation if the client selects products or services managed or offered through TCG and its affiliates.

TCG representatives may engage in personal securities transactions. Such transactions may raise potential conflicts of interest when such persons trade in a security that is owned by a client or considered for purchase or sale for a client. TCG has adopted policies and procedures that are intended to ensure that transactions are effected for clients in a manner that is consistent with the fiduciary duty and in accordance with applicable law. Associated persons who wish to purchase or sell securities of the types purchased or sold for clients may do so only in a manner consistent with TCG policies and procedures.

TCG representatives are not allowed to sell a security and would then recommend to sell for their clients. These transactions are often done through rebalancing and the trades are affected at roughly the same time. TCG management places all trades in accounts of representatives and clients to ensure no conflict of interest arises from the purchase or sale of securities.

Item 12 - Brokerage Practices

The nature of TCG's investment advisory services does not utilize brokers.

Item 13 - Review of Accounts

TCG Financial Services, LLC management reviews client accounts on a quarterly basis. The nature of the review is to determine if the maximum possible yield is being achieved for the client. Jorge H. Coloma and Vivian Coloma conduct these reviews together and/or separately.

TCG Financial Services, LLC's clients receive at least one annual report on their accounts. All clients have daily access to their accounts through the use of the internet.

Item 14 - Client Referrals and Other Compensation

TCG Financial Services, LLC has not entered into written compensation agreements

with any third party although this may be possible in the future. These payments are a portion of the fee charged by TCG and do not result in an increase in the amount of the fee paid by clients. Any solicitation or referral arrangements will comply with applicable laws that govern 1) the nature of the service, 2) fees to be paid, 3) disclosures to clients and 4) any necessary client consents.

Item 15 - Custody

TCG Financial Services, LLC does not control the custody of its private accounts.

Item 16 - Investment Discretion

TCG Financial Services, LLC manages the majority of its advisory assets on a non-discretionary basis.

Item 17 - Voting Client Securities

Proxies on securities held in client's accounts are voted by TCG Financial Services, LLC's internal manager. TCG Financial Services, LLC has adopted policies and procedures designed to prevent conflicts of interest from influencing proxy voting decisions its makes on behalf of client accounts and to ensure that such decisions are made in accordance with TCG Financial Services, LLC's fiduciary obligations to its clients. TCG Financial Services, LLC's proxy voting policies and procedures, including information for clients on how their securities were voted, are available upon written request to TCG Financial Services, LLC, Attn: Chief Compliance Officer, 2525 Ponce De Leon Blvd., Suite #300, Coral Gables, FL 33134.

In addition, TCG Financial Services, LLC actively reviews and may elect to participate in class action lawsuits involving securities on behalf of its clients.

Item 18 - Financial Information

Form ADV Part 2 requires investment advisors such as TCG Financial Services, LLC to disclose any financial condition reasonably likely to impair our ability to meet contractual commitments to clients. At this time, we have no information to report that is applicable to this item.