

# Twenty-First Tailored Solutions, Inc. Client Brochure

*This brochure provides information about the qualifications and business practices of Twenty-First Tailored Solutions, Inc. If you have any questions about the contents of this brochure, please contact us at (212) 418-6000 or by email at: [bob@twenty-first.com](mailto:bob@twenty-first.com). 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 Twenty-First Tailored Solutions, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Twenty-First Tailored Solutions, Inc.'s CRD number is: 158381*

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*Registration does not imply a certain level of skill or training.*

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## **Item 2: Material Changes**

Twenty-First Tailored Solutions, Inc. has not yet filed an annual updating amendment using the ADV Form 2A. Therefore there are no material changes to report.

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

Twenty-First Tailored Solutions, Inc. is a Corporation organized in the state of New York.

Twenty-First Tailored Solutions, Inc. was formed in June 2011, and the principal owner is Twenty-First Holdings, Inc.

### B. Types of Advisory Services

Twenty-First Tailored Solutions, Inc. (hereinafter "TFTS") offers the following services to advisory clients:

#### *Investment Supervisory Services*

TFTS offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. TFTS creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

TFTS evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. TFTS will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

#### *Services Limited to Specific Types of Investments*

TFTS generally limits its money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, options, derivatives, and government securities. TFTS may use other securities as well to help diversify a portfolio when applicable.

### **C. Client Tailored Services and Client Imposed Restrictions**

TFTS will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by TFTS on behalf of the client. TFTS will not use "model portfolios" but rather a specific set of recommendations for each client based on their personal restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent TFTS from properly servicing the client account, or if the restrictions would require TFTS to deviate from its standard suite of services, TFTS reserves the right to end the relationship.

### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. TFTS DOES NOT participate in any wrap fee programs.

### **E. Amounts Under Management**

TFTS has the following assets under management:

<b>Discretionary Amounts:</b>	<b>Non-discretionary Amounts:</b>	<b>Date Calculated:</b>
\$0.00	\$0.00	06/27/2011

## Item 5: Fees and Compensation

### A. Fee Schedule

#### *Investment Supervisory Services Fees*

Total Assets Under Management	Annual Fee
All Assets Under Management	0.25% - 1.00%

These fees are negotiable depending upon the needs of the client and complexity of the situation and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid quarterly in arrears, and clients may terminate their contracts with fifteen days' written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization.

### B. Payment of Fees

#### *Payment of Investment Supervisory Fees*

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in arrears. Advisory fees may also be invoiced and billed directly to the client quarterly in arrears. Clients may select the method in which they are billed.

### C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by TFTS. Please see Item 12 of this brochure regarding broker/custodian.

### D. Prepayment of Fees

TFTS collects its fees in arrears. It does not collect fees in advance.

## **E. Outside Compensation For the Sale of Securities to Clients**

Robert Neil Gordon is the President and Co-Founder of a Broker/Dealer, Twenty-First Securities Corporation. Representatives of TFTS are also registered representatives of Twenty-First Securities Corporation and accept compensation for the sale of securities to TFTS clients.

### ***1. This is a Conflict of Interest***

TFTS and its supervised persons will accept compensation for the sale of securities or other investment products, including asset based sales charges or services fees from the sale of mutual funds to its clients. This presents a conflict of interest and gives the supervised person and TFTS an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of securities or investment products for which TFTS receives compensation, TFTS will document the conflict of interest in the client file and inform the client of the conflict of interest.

### ***2. Clients Have the Option to Purchase Recommended Products From Other Brokers***

Clients always have the option to purchase TFTS recommended products through other brokers or agents that are not affiliated with TFTS.

### ***3. Advisory Fees in Addition to Commissions or Markups***

Advisory fees that are charged to clients may be reduced to offset the commissions or markups on securities or investment products recommended to clients.

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

TFTS does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7: Types of Clients**

TFTS generally provides management supervisory services to the following types of clients:

- ❖ High-Net-Worth Individuals
- ❖ Corporations or Business Entities
- ❖ Advisors of High Net Worth Clients



### ***Minimum Account Size***

There is no account minimum.

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

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

#### ***Methods of Analysis***

TFTS implements strategies based upon the goals of their clients. TFTS uses different types of securities and strategies to obtain the best after-tax results for their clients.

#### ***Investment Strategies***

TFTS uses long term trading, short term trading, short sales, margin transactions, and options writing (including covered options, uncovered options, or spreading strategies).

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **B. Material Risks Involved**

#### ***Investment Strategies***

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading, short sales, margin transactions, and options writing generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **C. Risks of Specific Securities Utilized**

TFTS generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. However, it will utilize short sales, margin transactions, and options writing. Short sales, margin transactions, and options writing generally hold greater risk of capital loss and clients should be aware that there is a material risk of loss using any of those strategies.

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SR) Proceedings**

There are no self-regulatory organization proceedings to report.

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

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

Robert Neil Gordon is the President and Co-Founder of a Broker/Dealer, Twenty-First Securities Corporation. Representatives of TFTS are also registered representatives of Twenty-First Securities Corporation. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. TFTS always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of TFTS in their capacity as a registered representative.

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

Robert Neil Gordon is a Commodity Trading Advisor. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. TFTS always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of TFTS in their capacity as a Commodity Trading Advisor.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Robert Neil Gordon is the President and Co-Founder of a Broker/Dealer, Twenty-First Securities Corporation. Representatives of TFTS are also registered representatives of Twenty-First Securities Corporation. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. TFTS always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of TFTS in their capacity as a registered representative.

### **D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections**

TFTS does not utilize nor select other advisors or third party managers. All assets are managed by TFTS management.

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

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

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

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

TFTS does not recommend that clients buy or sell any security in which a related person to TFTS or TFTS has a material financial interest.

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

From time to time, representatives of TFTS may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of TFTS to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. TFTS will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

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

From time to time, representatives of TFTS may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of TFTS to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. TFTS will always transact client's transactions before its own when similar securities are being bought or sold.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

The Custodians, Schwab Institutional, a division of Charles Schwab & Co., Inc. and RBC Correspondent Services were chosen based on their relatively low transaction fees and access to mutual funds and ETFs. TFTS will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

#### ***1. Research and Other Soft-Dollar Benefits***

TFTS receives research, products, or other services from its broker-dealer or another third-party in connection with client securities transactions ("soft dollar benefits"). There is no minimum client number or dollar number that TFTS must meet in order to receive free research from the custodian or broker/dealer. TFTS receives a benefit because it does not have to pay for or produce the research, services, or products and therefore TFTS might have an incentive to recommend a custodian based on its interest rather than their clients. The first consideration when recommending broker/dealers to clients is best execution.

#### ***2. Brokerage for Client Referrals***

TFTS may receive referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

TFTS allows clients to direct brokerage. TFTS may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients' money because without the ability to direct brokerage TFTS may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

#### **B. Aggregating (Block) Trading for Multiple Client Accounts**

TFTS maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing TFTS the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

## **Item 13: Reviews of Accounts**

#### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

Client accounts are reviewed at least quarterly by Robert Neil Gordon and Mark Fichtenbaum. They are the chief advisors and are instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at TFTS are assigned to these reviewers.

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

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

#### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

TFTS does not receive any economic benefit, directly or indirectly from any third party for advice rendered to TFTS clients.

### **B. Compensation to Non – Advisory Personnel for Client Referrals**

TFTS does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

TFTS, with client written authority, has limited custody of client's assets through direct fee deduction of TFTS's Fees only. Constructive custody of all client assets and holdings are maintained primarily at Schwab Institutional, a division of Charles Schwab & Co., Inc., RBC Correspondent Services, or any custodian of the clients choosing. Clients will receive statements from the custodian. Clients will receive all required account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. TFTS does not provide account statements to clients in addition to those provided by the custodian.

## **Item 16: Investment Discretion**

For those client accounts where TFTS provides ongoing supervision, the client has given TFTS written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides TFTS discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

## **Item 17: Voting Client Securities (Proxy Voting)**

TFTS will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

TFTS does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither TFTS nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

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

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