

# TRUSTIVO



**September 18, 2013**

*This Form ADV Part 2A (the "Brochure") provides information about the qualifications and business practices of TRUSTIVO Technologies LLC ("the Firm"). If you have any questions about the contents of this Brochure, please contact us at (617) 444-8405. The information in this Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC"), by the Massachusetts Securities Authority or by any state securities authority. Additional information about the Firm is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

**TRUSTIVO Technologies LLC**  
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[www.trustivo.com](http://www.trustivo.com)

## **Item 2 – Material Changes**

This document describes the Firms business practices, conflicts of interest (if any) and background, including background of its personnel in accordance with the prescribed SEC format. The firm has not made any material changes to this Brochure since September 18, 2013.

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## **Item 4 – Advisory Business**

Established in 2013, TRUSTIVO Technologies, LLC (“the Firm”) is a wholly owned subsidiary of TRUSTIVO LLC.

### **Description of Services:**

The Firm provides individuals, such as employees and retirees, (“Individuals”) with access to advisors and firms (“Advisors”) who provide personalized Financial and/or Retirement Strategies and other types of financial professional services. Collectively both Individuals and Advisors are called (“Members”). The Firm does not provide investment management services on a discretionary basis to its “Members” including but not limited to individuals, including high net worth individuals, institutional clients, such as employee benefits plans, endowment funds, foundations, religious organizations, and mutual funds. The Firm also does not provide investment management services to private clients, limited partnerships and limited liability companies.

Advisors may provide financial evaluations, plans, recommendations and proposals to individuals either directly, indirectly and/or on-line. Individuals are solely responsible for determining whether and when to implement the recommendations they receive from Advisors.

The Firm provides its services through the workplace, Employers, and/or other direct channels. Other services may include self-directed options for planning and separate managed accounts. These services are provided by independent registered investment advisor firms. All services are provided in accordance with a “Terms of Use” and “Privacy” Agreement which can be found on the Firm’s website at [www.trustivo.com](http://www.trustivo.com).

### **What the Firm does:**

- Provides members with Financial and retirement planning educational resources;
- Provides members with the ability to create a personalized financial and retirement plan;
- Provides members multiple options (including self-directed) to implement their respective plan.

### **How the Firm’s platform works:**

- On the Firm’s website it asks members to answer a few questions to learn about them and then help them decide how to both create and implement a personalized plan. All information is secure and confidential until the members choose to share it with advisors.

- The Firm provides access to an independent group of financial professionals providing complete financial and retirement planning services. They help the members both create and implement a plan.
- Members can search and explore the advisors backgrounds anonymously and at their option, the platform will introduce them to advisors that meet the criteria they specify.
- Members can also access online planning tools, a financial system designed to provide intelligent, unbiased financial advice over a lifetime. It will create an initial plan delivered directly to members with the option of periodic, automatic updates.
- Plan implementation can also be done online through the Firm's partner investment portal, offering over 130 investment strategies and designed for those members who want control and a diverse investing team.

#### **Assets under Management/Administration:**

The Firm does not hold any assets under management or administration.

#### **Item 5 – Fees and Compensation**

The Firm's fee schedule is included below. Notwithstanding this fee schedule, and subject to applicable laws and regulations, the Firm retains discretion over the fees that it charges to its clients, as well as any changes in its fee schedules. Fees may be negotiated or modified in the Firm's sole discretion in light of a client's special circumstances, service requirements or other factors. The Firm may agree to offer clients a fee schedule that is lower than that of any other comparable clients. The annual standard fee schedule below may be modified from time to time.

#### **Non-Asset Based Fees**

<b>Fee</b>	<b>Maximum Fee</b>
Advisor – Annual Platform Fees	\$480 per year
Advisor Transaction/Connection Fees	\$175 per connection
Advisor Success Fee – One Time	\$250 per new account opening
Partner Firm – Monthly Platform Fees	\$2,000 to Higher (Negotiable)

#### **Asset Based Fees**

<b>AUM</b>	<b>Maximum Fee</b>
All Assets	25 – 100 BPS

“Advisors” are defined as but not limited to all Registered Investment Advisors, Registered Broker Dealers, other non-registered Financial Professionals, Financial Planners, Wealth Managers, and/or Plan Advisors, Broker Dealer Firms, Custodial Firms, Service Firms, Agents, and all other legal entities. Advisors authorize the Firm to collect these fees immediately as they become due using electronic payment methods or otherwise. The recurring annual fees will be collected on each year’s first day anniversary of the initial subscription.. The annual platform subscription fee will not be prorated or refunded in any way. The subscription renewal is automatic. All fees may be changed by the Firm at any time and all fees are NON-REFUNDABLE. Corporate discount codes must be entered by the advisor upon the initial sign up process; subsequent discounts are not allowed. The Firm may modify either the amount and (or) duration of the discount/promotion at any time.

#### **Additional Fees and Expenses Payable by Members**

The Firm fee schedule does not include fees charge by other licensed entities such as brokerage commissions, transaction fees, service provider fees, and other related costs and expenses, which will be incurred by the client. Execution of client transactions typically requires payment of brokerage commissions by clients. Investment activity may also involve other transaction fees payable by clients, such as sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. In addition, clients may incur certain charges imposed by custodians, broker/dealers, third-party investment consultants, and other third parties, such as custodial fees, consulting fees, administrative fees, and transfer agency fees.

### **Item 6 – Performance-Based Fees**

#### **Performance-Based Fees**

The Firm does not receive performance-based fees. A performance-based fee is a fee representing an asset manager’s compensation for managing an account, which is based upon a percentage of the net profits of the account being managed. When calculating net profits, performance-based fees may be based on absolute or benchmark relative returns. For accounts managed in accordance with certain investment strategies, a performance-based fee represents our standard fee arrangement.

## Item 7 – Types of Clients

As noted, the Firm provides services to “Members” including individual employees and retirees and advisors as previously defined.

### Conditions for Managing Accounts

As noted in Item 4, as a general rule, the Firm does not require a minimum account size. However, the minimum account size may be required by partners and/or advisors and may be waived or modified.

## Item 8 – Risk of Loss

### Certain Risk Considerations

Investments in securities and other financial instruments and products are subject to many types of risk that can cause the permanent loss of capital. The investment strategies utilized by our partners carry different levels and types of risk. In each strategy, all securities include a risk of loss of principal and any profits that have not been realized. The stock and bond markets fluctuate substantially over time and, as recent global and domestic economic events have indicated, performance of any investment is not guaranteed. As a result, there is a risk of loss of the assets the partners manage on behalf of its clients, and such a loss may be out of our control. We cannot guarantee any level of performance and cannot guarantee that clients will not experience a loss of value in their account. In addition, poor investment selection could cause our partner’s investment strategies to underperform other investment accounts or products managed by other firms under similar investment strategies.

Equity securities are subject to certain risks. Market prices of equity securities may fall rapidly or unpredictably and will rise and fall due to changing economic, political or market conditions or in response to events that affect particular industries or companies. Equity investments generally have greater price volatility than fixed-income investments. Because their prices tend to reflect future investor expectations, growth stocks may be more sensitive to change in current or expected earnings than other types of stocks and tend to be more volatile than the market in general. Growth stocks also may underperform value stocks and other investments during given periods.

As noted above, each of our partner’s strategies has the potential for clients’ assets to decline in value. Some of the specific risks to which client assets may be susceptible include sector risk, concentration risk, geopolitical risk, small- and mid-capitalization company risk, and large-cap stock risk.

**Sector Risk** Investment strategies focused on or concentrated in a single sector may be affected by particular economic or market events and could be more volatile than a strategy with

securities across industry sectors.

**Concentration Risk** Concentrated portfolios that invest in a relatively small number of securities may have more risk because changes in the value of a single security or the impact of a single economic, political or regulatory occurrence may have a greater adverse impact on the strategy's performance.

**Geopolitical risk** The change in political status of any country can have profound effects on the value of investments exposed to that country.

**Small- and Mid-Capitalization Company Risk** The stocks of small- and mid-capitalization companies often have greater price volatility, lower trading volume and less liquidity than the stocks of larger, more established companies.

**Large-Cap Stock Risk** Investment strategies focusing on large-cap companies may underperform other equity investment strategies as large-cap companies may not experience sustained periods of growth in the mature product markets in which they operate.

**Foreign Currency Risk** Foreign currency risk results from constantly changing exchange rate between local currency and the US dollar.

## **Item 9 – Disciplinary Information**

None of the Firm's management persons has been involved in a disciplinary event in the last ten years that is deemed to be material to its business or the integrity of its staff.

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

Neither the Firm nor its management persons are a registered broker/dealer. The Firm is cooperating with partners to bring to the market a holistic optimizer/planner application that will provide advice for the totality of the financial situation of an individual or a family. This product is not and will not be in the future offered as a condition for supplying other financial or investment clients to the Firm's clients. Existing or new clients may ask for any of the Firms' offered services, including this product, individually or as a bundle. The Firm is also cooperating with partners to continuously improve and expand its services to its members whether through on-line or other services.

## **Item 11 – Code of Ethics**

The Firm has established a Code of Ethics (the "Code") pursuant to Rule 204A1- of the



Investment Advisers Act of 1940. The code establishes and reinforces variety of restrictions, procedures and disclosures designed to address conflicts of interest arising between and among its members and the Firm and its personnel.

The Code describes the standard of conduct requires of its employees and sets forth restrictions on certain activities, including personal trading in accounts owned, managed or beneficially owned by the employee. The Code's provisions also include requirements relating to areas such as gifts and business entertainment, confidentiality of information, and certain contributions. By setting forth the regulatory and ethical standards to which the Firm's employees must adhere, the Code supports our efforts to promote a high level of professional ethical conduct.

We are firmly committed to making our employees and clients (both current and prospective) aware of the requirements within our Code. All of our employees are provided with a copy of our Code at the time of hire and annually thereafter, and each employee must affirm that they have received a copy of the Code, and that they have read and understand its provisions.

#### **Item 12 – Brokerage Practices**

The Firm does not have the authority to select, and does not recommend, broker/dealers to effect trades or determine commissions paid and is not responsible for obtaining or monitoring best execution. The Firm does not receive soft-dollar commission.

#### **Item 13 – Review of Accounts**

The Firm does not review members accounts and has no discretionary management authority

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

The Firm does currently have a referral agreement with certain third-party firms. Such arrangements are disclosed as required under Rule 206(4)-3 of the Investment Advisers Act of 1940 ("The Act").

#### **Item 15 – Custody**

The Firm does not act as a custodian. Clients must make their own arrangements for custody of securities in their accounts. Such custodians may be broker/dealers, banks, trust companies, or other qualified institutions. The qualified custodian is required to provide the client with at least quarterly account statements. Each client should carefully review the qualified custodian's statement upon receipt to determine that it completely and accurately states all holdings in the client's account and all account activity over the relevant period. Any discrepancies identified by a client should be immediately reported to the qualified custodian.

**Item 16 – Investment Discretion**

The Firm does not accept investment discretionary authority over individual accounts.

**Item 17 – Voting Client Securities**

The Firm does not have responsibility for voting proxies relating to securities held in members' accounts. Members will receive any proxies or other solicitations directly from their provider or applicable custodian. The Firm does not have the legal authority or any responsibility for initiating, taking, advising on, or responding to any action with respect to potential or existing class action litigation, bankruptcy or any other proceeding involving any security held in members' or clients' accounts.

**Item 18 – Financial Information**

The Firm does not believe that its financial commitments will impair its ability to meet contractual commitments to clients, and has not been the subject of a bankruptcy proceeding.

## **Form ADV Part 2B: Brochure Supplement**

*This Brochure Supplement provides information about the TRUSTIVO Technologies, LLC personnel that supplements the TRUSTIVO Technologies, LLC Brochure. You should have received a copy of that Brochure. Please contact us at 617-444-8405 if you did not receive a Brochure for TRUSTIVO Technologies, LLC, or if you have any questions about the contents of this supplement. Additional information about TRUSTIVO Technologies, LLC personnel is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **ITEM 2 - EDUCATIONAL BACKGROUNDS AND BUSINESS EXPERIENCE**

The Executive Management Team (EMT) of TRUSTIVO Technologies LLC is comprised exclusively of members with a broad range of experience and expertise.

### **James D. Stevens**

Mr. Stevens has more than twenty five years of experience in the financial services industry. Most recently, Mr. Stevens was Executive Director – Institutional Business Development at Invesco where he was responsible for relationship management and business development activities in the defined contribution, insurance and sub-advisory channels. Prior to that he served as Executive Director for the Insurance and sub-advisory businesses for Van Kampen/Morgan Stanley Investment Management. Mr. Stevens joined Van Kampen in 1996 as national sales manager for the firm's 401(k) product offerings. Prior to joining Van Kampen, Mr. Stevens was Vice President of retirement strategic marketing for Fidelity Investments Institutional Services from 1994 to 1996. From 1986 to 1994, Mr. Stevens was Corporate Vice President and National Sales Manager of retirement plans for PaineWebber. Mr. Stevens also holds Series 7, 24, 63 and 66 FINRA licenses.

### **EDUCATION:**

- BA Economics, Denison University, Granville Ohio.
- Securities Industry Institute, The Wharton School, Philadelphia PA

### **Duncan Mackay**

Mr. Mackay is a senior executive with over 30 years (12 years as a CEO) growing software companies through both organic growth and acquisitions. He has successfully managed software companies from the startup phase with innovative product introductions, through periods of sustained growth leading to acquisition by major industry players. As a senior executive with Nabnasset, Mr. Mackay worked closely with companies like Citibank, CIBC, TD Bank, Wells Fargo, Swiss Bank, Deutsche Bank and ManuLife to implement innovative and effective telephone and web based solutions for customer acquisition and superior customer service. For BBN Software Mr. Mackay lead the product planning and development of (award winning) analytics and optimization solutions for leading companies such as DuPont, Dow Chemical, Ford, Intel, Motorola, Renault, BASF, Bayer, and Siemens. At BBN he created a target business unit that managed the rapid expansion of the use of a marketing leading clinical trials data management solution used by GlaxoSmithKline, Roche, Novartis, Bayer, AstraZeneca, Genetech, NovoNordisk and others. Mr. Mackay lead the creation of a superior security and compliance software as a service solution (SaaS) for monitoring the movement of confidential information on mobile devices and launched the service targeted at small to medium sized business through industry based affinity groups with an initial target in Financial Services.

**EDUCATION:**

- MBA, Northeastern University, Boston, MA
- M.A. (Hons.), Economics, University of Edinburgh, Scotland

**Rad H. Pasovschi**

Mr. Pasovschi has more than twenty five years of experience as a seasoned, pragmatic and hands-on industry executive. Most recently he led the North America Capital Markets and Wealth Management groups on behalf of a global financial services firm. His clients included leading financial services institutions such as Bank of York, Northern Trust, Morgan Stanley, Merrill Lynch and American Funds. Mr. Pasovschi started his career with Price Waterhouse where he spent 14 years in increasingly senior roles in Financial Services. Subsequently he was Senior Vice President of Putnam Investments where he was responsible for all the Client Services, Retirement, Institutional as well as the Advisor groups. He managed all technology initiatives, data centers, call centers and was responsible for several business units with millions of plan participants. He led a team of several hundred professionals towards industry leading capabilities and achievements.

**EDUCATION:**

- MBA, Concordia University, Montreal, Canada
- Bachelor of Computer Science, Concordia University Montreal Canada
- Certified Information Systems Auditor, CISA, The EDP Auditors Association

**ITEMS 3, 4 & 5 - DISCIPLINARY INFORMATION, OTHER BUSINESS ACTIVITIES, ADDITIONAL COMPENSATION**

There is no disciplinary information, other business activities or additional compensation to report for each of the above persons.

**ITEM 6 - SUPERVISION**

The Executive Management Team (EMT) has overall responsibility for the firm's operations.