

# Money Management Financial Services LLC dba Bluefin Financial Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Money Management Financial Services LLC dba Bluefin Financial. If you have any questions about the contents of this brochure, please contact us at (856) 795-9998 or by email at: [Mike@bluefinfinancial.com](mailto:Mike@bluefinfinancial.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 Money Management Financial Services LLC dba Bluefin Financial is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Money Management Financial Services LLC dba Bluefin Financials' CRD number is: 288375.*

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

Version Date: 04/30/2018

## **Item 2: Material Changes**

Money Management Financial Services LLC dba Bluefin Financial has the following material changes to report. Material changes relate to Money Management Financial Services LLC dba Bluefin Financials' policies, practices or conflicts of interests.

- Money Management Financial Services LLC has updated contact information (Cover Page).
- Money Management Financial Services LLC has updated Item 4.B.
- Money Management Financial Services LLC has updated Item 4.E.
- Money Management Financial Services LLC has updated Item 5.A.
- Money Management Financial Services LLC has updated Item 5.B.
- Money Management Financial Services LLC has updated Item 5.E.
- Money Management Financial Services LLC has updated Item 10.
- Money Management Financial Services LLC has updated Item 12.
- Money Management Financial Services LLC has updated Item 14.
- Money Management Financial Services LLC has updated Item 15.
- Money Management Financial Services LLC has transitioned to registration with the United States Securities and Exchange Commission from its prior registration at the state level.
- Michael Anthony Zielinski is now Chief Compliance Officer.

## Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes.....	ii
Item 3: Table of Contents.....	iii
Item 4: Advisory Business.....	2
A. Description of the Advisory Firm.....	2
B. Types of Advisory Services.....	2
C. Client Tailored Services and Client Imposed Restrictions.....	3
D. Wrap Fee Programs.....	4
E. Assets Under Management.....	4
Item 5: Fees and Compensation.....	4
A. Fee Schedule.....	4
B. Payment of Fees.....	7
C. Client Responsibility For Third Party Fees.....	8
D. Prepayment of Fees.....	8
E. Outside Compensation For the Sale of Securities to Clients.....	8
Item 6: Performance-Based Fees and Side-By-Side Management.....	9
Item 7: Types of Clients.....	9
Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss.....	9
A. Methods of Analysis and Investment Strategies.....	9
B. Material Risks Involved.....	10
C. Risks of Specific Securities Utilized.....	11
Item 9: Disciplinary Information.....	13
A. Criminal or Civil Actions.....	13
B. Administrative Proceedings.....	13
C. Self-regulatory Organization (SRO) Proceedings.....	13
Item 10: Other Financial Industry Activities and Affiliations.....	13
A. Registration as a Broker/Dealer or Broker/Dealer Representative.....	13
B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.....	13
C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests.....	14
D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections.....	14
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	15
A. Code of Ethics.....	15
B. Recommendations Involving Material Financial Interests.....	15
C. Investing Personal Money in the Same Securities as Clients.....	15
D. Trading Securities At/ Around the Same Time as Clients' Securities.....	15
Item 12: Brokerage Practices.....	16

A.	Factors Used to Select Custodians and/or Broker/Dealers .....	16
1.	Research and Other Soft-Dollar Benefits .....	16
2.	Brokerage for Client Referrals.....	16
3.	Clients Directing Which Broker/Dealer/Custodian to Use.....	16
B.	Aggregating (Block) Trading for Multiple Client Accounts.....	17
Item 13:	Review of Accounts.....	17
A.	Frequency and Nature of Periodic Reviews and Who Makes Those Reviews.....	17
B.	Factors That Will Trigger a Non-Periodic Review of Client Accounts .....	17
C.	Content and Frequency of Regular Reports Provided to Clients.....	17
Item 14:	Client Referrals and Other Compensation .....	18
A.	Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes).....	18
B.	Compensation to Non – Advisory Personnel for Client Referrals.....	19
Item 15:	Custody .....	19
Item 16:	Investment Discretion.....	19
Item 17:	Voting Client Securities (Proxy Voting).....	20
Item 18:	Financial Information.....	20
A.	Balance Sheet.....	20
B.	Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients .....	20
C.	Bankruptcy Petitions in Previous Ten Years .....	20

## Item 4: Advisory Business

### A. Description of the Advisory Firm

Money Management Financial Services LLC dba Bluefin Financial (hereinafter “BFF”) is a Limited Liability Company organized in the State of New Jersey. The firm was formed in July 2017, and the principal owners are Theodore Michael Suleski and Joseph Anthony Zielinski.

### B. Types of Advisory Services

#### *Portfolio Management Services*

BFF offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. BFF creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

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

BFF evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. BFF will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Although BFF may also accept a non-discretionary client relationship as determined by the adviser. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

BFF seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of BFF’s economic, investment or other financial interests. To meet its fiduciary obligations, BFF attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, BFF’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is BFF’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

## ***Pension Consulting Services***

BFF offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options, and if necessary making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan
- investment advisement services
- allocating plan assets based on investment objectives of the plan
- managing plan assets in ways designed to achieve objectives
- selecting mutual funds that plan participants can choose as their funding vehicles

BFF offers ongoing consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans) based on the demographics, goals, objectives, time horizon, and/or risk tolerance of the plan's participants. Pension consulting services are provided on either a discretionary or non-discretionary basis. BFF performs trades as part of its discretionary pension consulting services only.

## ***Financial Planning***

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. All planning will include a consultation and/or a written financial plan. With respect to financial plans, BFF's services will conclude upon delivery of the financial plan.

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

BFF limits its investment advice to mutual funds, a wide range of fixed income securities, insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), MLPs (oil & gas), REITs, options, treasury inflation protected/inflation linked bonds and non-U.S. securities. BFF may use other securities as well to help diversify a portfolio when applicable.

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

BFF offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client

Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). 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 BFF from properly servicing the client account, or if the restrictions would require BFF to deviate from its standard suite of services, BFF 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 other administrative fees. BFF does not participate in any wrap fee programs.

#### **E. Assets Under Management**

BFF has the following assets under management:

<b>Discretionary Amounts:</b>	<b>Non-discretionary Amounts:</b>	<b>Date Calculated:</b>
\$127,929,961	\$10,814,776	December 2017

### **Item 5: Fees and Compensation**

#### **A. Fee Schedule**

The annualized fees for investment advisement services can be charged on a fixed annual rate basis or as a percentage of assets under management, according to the following schedule:

##### *Portfolio Management Fees*

<b>Total Assets Under Management</b>	<b>Annual Fees</b>
\$0 - \$250,000	1.25%
\$250,001 - \$500,000	1.00%
\$500,001 - \$750,000	0.75%
\$750,001 - \$2,000,000	0.50%
\$2,000,001 - \$5,000,000	0.25%
\$5,000,000 - AND UP	0.10%

The fee schedule above is based on a tiered fee schedule.

BFF may group certain related accounts for the purpose of determining the annualized fee.

BFF and your representative do not retain 12b-1 fees paid by funds for either qualified or non-qualified accounts. Any 12b-1 fees paid are wholly retained by TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC.

All annual fixed fees are discussed and agreed to by the parties and are based on the nature of the services being provided and the complexity of each client's circumstances. Such fees are billed on a quarterly basis which is determined by the adviser and client. All fees are agreed upon prior to entering into a contract with any client.

The fixed rate for these services will be between \$250 and \$25,000.

**Limited Negotiability of Advisor Fees:** Although BFF has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets, related accounts, portfolio style, account composition, reporting needs, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client.

An average of the daily balance in the client's account throughout the billing period is used to determine the market value of the assets upon which the advisory fee is based.

These fees are negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of BFF's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract with 10 days' written notice. The agreement may be terminated by either the client or BFF upon written notice.

### ***Pension Consulting Services Fees***

Pension consulting plans will be provided on an hourly or fixed fee basis. All other pension consulting services will be provided for an asset-based fee. Fees can be paid by deducting the fee from the investment accounts or by invoice to the plan trustee. Fee payment will be determined by the adviser and client.



## Asset-Based Fees for Pension Consulting

Total Assets Under Management	Annual Fee
\$0 - \$250,000	1.25%
\$250,001 - \$500,000	1.00%
\$500,001 - \$750,000	0.75%
\$750,001 - \$2,000,000	0.50%
\$2,000,001 - \$5,000,000	0.25%
\$5,000,001 - AND UP	0.10%

The fee schedule above is based on a tiered fee schedule.

BFF may group certain related accounts for the purpose of determining the annualized fee.

BFF and your representative do not retain 12b-1 fees paid by funds for either qualified or non-qualified accounts. Any 12b-1 fees paid are wholly retained by TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC.

All annual fixed fees are discussed and agreed to by the parties and are based on the nature of the services being provided and the complexity of each client's circumstances. Such fees are billed on a quarterly basis which is determined by the adviser and client. All fees are agreed upon prior to entering into a contract with any client.

The fixed rate for these services will be between \$250 and \$25,000.

Limited Negotiability of Advisor Fees: Although BFF has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets, related accounts, portfolio style, account composition, reporting needs, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client.

An average of the daily balance in the client's account throughout the billing period is used to determine the market value of the assets upon which the advisory fee is based. However, the advisory fee for non-discretionary pension accounts held away from TD Ameritrade, Inc. Member FINRA/SIPC is calculated using the end of quarter balance.

These fees are negotiable and the final fee schedule is attached as Exhibit II of the pension consulting agreement.

Clients may terminate the agreement without penalty for a full refund of BFF's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the pension consulting agreement with 10 days' written notice. BFF bills based on the balance on the first day of the billing period. The agreement may be terminated by either the client or BFF upon written notice.

### **Fixed Fees**

The rate for creating client pension consulting plans is between \$500 and \$5,000. The final fee schedule will be attached as Exhibit II of the pension consulting agreement. This service may be canceled with 10 days' notice.

### **Hourly Fees**

The hourly fee for these services is between \$200 and \$400. The final fee schedule will be attached as Exhibit II of the Investment Advisory Contract.

### ***Financial Planning Fees***

#### **Fixed Fees**

The negotiated fixed rate for creating client financial plans is between \$500 and \$5,000.

#### **Hourly Fees**

The negotiated hourly fee for these services is between \$200 and \$400.

Clients may terminate the agreement without penalty, for full refund of BFF's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement upon written notice. The agreement may be terminated by either the client or BFF upon written notice.

## **B. Payment of Fees**

### ***Payment of Portfolio Management Fees***

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in arrears.

### ***Payment of Pension Consulting Fees***

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in arrears.

Fixed and hourly pension consulting fees are paid via check, in arrears upon completion.

BFF will determine whether a client is charged on an asset-based basis, an hourly basis or a fixed fee basis. This will be determined based on the type of client and the complexity of the work.

### ***Payment of Financial Planning Fees***

Fixed and hourly financial planning fees are paid via check, in arrears upon completion.

BFF will determine whether a client is charged on an hourly basis or a fixed fee basis. This will be determined based on the type of client and the complexity of the plan to be created.

## **C. Client Responsibility 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 BFF. Please see Item 12 of this brochure regarding broker-dealer/custodian.

## **D. Prepayment of Fees**

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

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

Theodore Michael Suleski, Joseph Anthony Zielinski and Walter Joseph McCormac are insurance agents. In these roles, they may accept compensation for the sale of investment products to BFF clients.

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

Supervised persons may accept compensation for the sale of investment products, including asset based sales charges or service fees from the sale of mutual funds to BFF's clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of investment products for which the supervised persons receives compensation, BFF 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 BFF recommended products through other brokers or agents that are not affiliated with BFF.

### ***3. Commissions are not BFF's primary source of compensation for advisory services***

Commissions are not BFF's primary source of compensation for advisory services.

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

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on investment products recommended to clients.

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

BFF 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**

BFF provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans
- ❖ Corporations or Business Entities

There is no account minimum for any of BFF's services.

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

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

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

BFF's methods of analysis include Charting analysis, Fundamental analysis, Modern portfolio theory and Technical analysis.

**Charting analysis** involves the use of patterns in performance charts. BFF uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

**Technical analysis** involves the analysis of past market data; primarily price and volume.

### *Investment Strategies*

BFF uses long term trading, short term trading and options trading (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**

### *Methods of Analysis*

**Charting analysis** strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Modern portfolio theory** assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

### ***Investment Strategies***

BFF's use of options trading holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Options transactions** involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

**Short term trading** risks include liquidity, economic stability, and inflation, in addition to the long-term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

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

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

BFF's use of options trading holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature or a mix of both.

**Equity** investment refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Options** are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices

or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

**Non-U.S.** securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Past performance is not indicative of future results. 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 (SRO) 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**

Neither BFF nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

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

Neither BFF nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.



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

Theodore Michael Suleski is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. BFF 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 utilize the services of any representative of BFF in connection with such individual's activities outside of BFF.

Joseph Anthony Zielinski is a certified public accountant and from time to time, may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. BFF always acts in the best interest of the client and clients are in no way required to utilize the services of any representative of BFF in connection with such individual's activities outside of BFF.

Joseph Anthony Zielinski is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. BFF 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 utilize the services of any representative of BFF in connection with such individual's activities outside of BFF.

Walter Joseph McCormac is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. BFF 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 utilize the services of any representative of BFF in connection with such individual's activities outside of BFF.

Michael Anthony Zielinski is the Chief Compliance Officer (CCO) for BFF. As such, he will provide all compliance and oversight pertaining to BFF and its clients. BFF always acts in the best interest of the client and clients are in no way required to utilize the services of any representative of BFF in connection with such individual's activities outside of BFF.

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

BFF does not utilize third-party investment advisers.

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

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

BFF has 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. BFF's Code of Ethics is available free upon request to any client or prospective client.

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

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

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

From time to time, representatives of BFF may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of BFF 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. BFF will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage 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 BFF may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of BFF 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; however, BFF will never engage in trading that operates to the client's disadvantage if representatives of BFF buy or sell securities at or around the same time as clients.

## **Item 12: Brokerage Practices**

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

Custodians/broker-dealers will be recommended based on BFF's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and BFF may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in BFF's research efforts. BFF will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

BFF will require clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC. TD Ameritrade Institutional is an independent and unaffiliated SEC-registered broker-dealer.

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

While BFF has no formal soft dollars program in which soft dollars are used to pay for third party services, BFF may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). BFF may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and BFF does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. BFF benefits by not having to produce or pay for the research, products or services, and BFF will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that BFF's acceptance of soft dollar benefits may result in higher commissions charged to the client.

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

BFF receives no 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***

BFF will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

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

If BFF buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, BFF would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. BFF would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

## **Item 13: Review of Accounts**

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

All client accounts for BFF's advisory services provided on an ongoing basis are reviewed as needed, as required and as appropriate by your representative and/or by Michael Anthony Zielinski, CCO, with regard to clients' respective investment policies and risk tolerance levels.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by your representative and/or by Michael Anthony Zielinski, CCO. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

### **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).

With respect to financial plans, BFF's services will conclude upon delivery of the financial plan.

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

Each client of BFF's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

## **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)**

BFF participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers services to independent investment advisors, which include custody of securities, trade execution, clearance and settlement of transactions. BFF receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, BFF participates in TD Ameritrade's institutional advisor program and BFF will recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between BFF's participation in the Program and the investment advice it gives to its clients, although BFF receives economic benefits through its participation in the Program that are not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): advanced reporting and billing capabilities, receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving BFF participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have BFF's fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to BFF by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by BFF's related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit BFF but may not benefit its client accounts. These products or services may assist BFF in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help BFF manage and further develop its business enterprise. The benefits received by BFF or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade.

BFF also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to other independent advisers participating in

the Program. Specifically, BFF utilizes Panoramix, Morningstar, MoneyGuidePro, and Smarsh services via its relationship with TD Ameritrade. TD Ameritrade provides the Additional Services to BFF at its own expense, meaning BFF does not pay any fees to TD Ameritrade for the Additional Services. In providing the Additional Services to BFF, TD Ameritrade can consider the amount and profitability to TD Ameritrade of the assets in and trades placed for BFF client accounts maintained with TD Ameritrade. BFF and TD Ameritrade have entered into a separate agreement governing the terms for provision of the Additional Services and TD Ameritrade has the right to terminate that agreement in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services, BFF has an incentive to maintain client assets with, and place transactions using, TD Ameritrade.

Clients should be aware that the receipt of these economic benefits by BFF or its related persons in and of itself creates a conflict of interest and can indirectly influence the BFF's choice of TD Ameritrade for custody and brokerage services. Nevertheless, BFF's receipt of these benefits does not diminish its duty to act in the best interests of its clients (including seeking best execution of trades) and BFF therefore endeavors at all times to put the interests of its clients first, consistent with its fiduciary duty to clients.

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

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

### **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, BFF will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Custody is disclosed because BFF has authority to transfer money from client account(s), which constitutes a standing letter of authorization (SLOA). Accordingly BFF will follow the safeguards specified by the SEC rather than undergo an annual audit. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

### **Item 16: Investment Discretion**

BFF provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, BFF manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

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

BFF 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**

BFF neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

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

Neither BFF nor its management has any financial condition that is likely to reasonably impair BFF's ability to meet contractual commitments to clients.

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

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