

# **TruPath Financial Group, LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: December 16, 2018**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of TruPath Financial Group, LLC (“TruPath” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (320) 235-8065.

TruPath is a registered investment advisor with the U.S. Securities and Exchange Commission. The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about TruPath to assist you in determining whether to retain the Advisor.

Additional information about TruPath and its Advisory Persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 298034.

**TruPath Financial Group, LLC**  
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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of TruPath. For convenience, we have combined these documents into a single disclosure document.

TruPath believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. TruPath encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

TruPath is a newly formed registered investment advisor. This is the initial filing of the Disclosure Brochure.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 298034. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (320) 235-8065.

## Item 3 – Table of Contents

<b>Item 1 – Cover Page</b>	<b>1</b>
<b>Item 2 – Material Changes</b>	<b>2</b>
<b>Item 3 – Table of Contents</b>	<b>3</b>
<b>Item 4 – Advisory Services</b>	<b>4</b>
A. Firm Information	4
B. Advisory Services Offered	4
C. Client Account Management	6
D. Wrap Fee Programs	6
E. Assets Under Management	6
<b>Item 5 – Fees and Compensation</b>	<b>6</b>
A. Fees for Advisory Services	6
B. Fee Billing	7
C. Other Fees and Expenses	8
D. Advance Payment of Fees and Termination	8
E. Compensation for Sales of Securities	8
<b>Item 6 – Performance-Based Fees and Side-By-Side Management</b>	<b>9</b>
<b>Item 7 – Types of Clients</b>	<b>9</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss</b>	<b>9</b>
A. Methods of Analysis	9
B. Risk of Loss	9
<b>Item 9 – Disciplinary Information</b>	<b>10</b>
<b>Item 10 – Other Financial Industry Activities and Affiliations</b>	<b>10</b>
<b>Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b>	<b>11</b>
A. Code of Ethics	11
B. Personal Trading with Material Interest	11
C. Personal Trading in Same Securities as Clients	11
D. Personal Trading at Same Time as Client	11
<b>Item 12 – Brokerage Practices</b>	<b>11</b>
A. Recommendation of Custodian[s]	11
B. Aggregating and Allocating Trades	12
<b>Item 13 – Review of Accounts</b>	<b>12</b>
A. Frequency of Reviews	12
B. Causes for Reviews	12
C. Review Reports	13
<b>Item 14 – Client Referrals and Other Compensation</b>	<b>13</b>
A. Compensation Received by TruPath	13
B. Client Referrals from Solicitors	13
<b>Item 15 – Custody</b>	<b>13</b>
<b>Item 16 – Investment Discretion</b>	<b>14</b>
<b>Item 17 – Voting Client Securities</b>	<b>14</b>
<b>Item 18 – Financial Information</b>	<b>14</b>
<b>Form ADV 2B – Brochure Supplements</b>	<b>15</b>
<b>Privacy Policy</b>	<b>25</b>

## Item 4 – Advisory Services

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### A. Firm Information

TruPath Financial Group, LLC (“TruPath” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). TruPath was organized as a Limited Liability Company (“LLC”) under the laws of the State of Minnesota in November 2018 and launched as a registered investment advisor in January 2019. TruPath is owned and managed by Jonathan D. Kreps (Managing Principal and Chief Compliance Officer).

This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by TruPath. For information regarding this Disclosure Brochure, please contact Jonathan D. Kreps (Chief Compliance Officer) at (320) 235-8065.

TruPath serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

### B. Advisory Services Offered

TruPath offers investment advisory services to individuals, families, trusts, charitable organizations, businesses and retirement plans (each referred to as a “Client”). TruPath provides individualized services to each Client, which are determined during initial conversations and updated over the course of the relationship as needed or requested by the Client. However, all services offered fall into the Investment Management Services, also known as Asset Management Services, and Financial Planning Services. Customized solutions for Client are achieved through continuous personal contact and interaction while providing discretionary investment management and financial planning services.

#### Investment Management Services

TruPath provides customized wealth management solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management, financial planning and related advisory services. TruPath works closely with each Client on an ongoing basis. TruPath works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to design and implement an investment strategy. TruPath will construct investment portfolios through the Advisor’s internal investment management and/or the use of unaffiliated investment managers or investment platforms. Please see below.

Internal Investment Management – TruPath works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. TruPath will then construct a portfolio, consisting of primarily of exchange-traded funds (“ETFs”), mutual funds, individual equity securities, individual and fixed income securities. The Advisor may also utilize options and other types of investments, as appropriate, to meet the needs of each Client. Evaluation of legacy investments will include a review of portfolio fit, tax situation and other considerations.

The Client-specific investment objectives will be set forth in a written Investment Policy Statement describing items such as asset allocation, personal circumstances, goals, liquidity needs, etc. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor. TruPath will construct, implement and monitor the portfolio on a discretionary basis with respect to the Client’s investment policy statement.

At no time will TruPath accept or maintain custody of a Client’s funds or securities. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment advisory agreement. Please see Item 12 – Brokerage Practices and Item 15 - Custody.

*Use of Independent Managers* - TruPath may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively "Independent Managers") for all or a portion of a Client's investment portfolio. In such instances, the Client may be required to authorize and enter into an advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide investment management and related services. The Advisor may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship. The Advisor will perform initial and ongoing oversight and due diligence over the selected Independent Manager[s] to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests. The Client, prior to entering into an agreement with unaffiliated investment manager[s] or investment platform[s], will be provided with the Independent Manager's Form ADV 2A (or a brochure that makes the appropriate disclosures).

#### Financial Planning Services

Financial Planning Services are at the core of the Client relationship with TruPath. Financial planning is an evaluation of a Client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans while also understanding personal values, goals and objectives. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the Client.

TruPath will provide financial planning and consulting services to Clients pursuant to a written financial planning agreement. Services are offered in several areas depending on the Client's goals, objectives and financial situation. Generally, such financial planning services will involve a written report which provides the Client with a detailed financial plan to assist the Client in achieving his or her financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, financial position, tax considerations, employee benefits, investment analysis, insurance analysis, retirement analysis, death and disability considerations, and estate planning.

Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly by the Client.

Financial planning and consulting recommendations may pose a conflict between the interests of the Advisor and the interests of the Client. Implementation of financial planning recommendations is entirely at the Client's discretion. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor. TruPath will work with Clients to implement recommendations and referrals to other professionals may be made where appropriate to meet the Client's needs.

#### Retirement Plan Advisory Services

TruPath provides advisory services on behalf of the retirement plans (each a "Plan") and the company/sponsor (the "Plan Sponsor") and the individuals enrolled in a Plan (the "Plan Participant"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Due to the differences in size, complexity and overall needs of the Plan, each engagement is customized based on the requirements set forth by the Plan Sponsor. The Advisor's services may include:

- Analysis of Retirement Platforms and Vendors
- Investment Policy Statement ("IPS") Design and Monitoring
- Plan Participant Education
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Discretionary Investment Management

Certain of these services are provided by TruPath serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2),

the Plan Sponsor is provided with a written description of TruPath's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

### **C. Client Account Management**

Prior to engaging TruPath to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – TruPath, in connection with the Client, will develop an investment strategy that seeks to achieve the Client's goals and destinations.
- Portfolio Construction – TruPath will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – TruPath will provide investment management and ongoing oversight of the Client's investment portfolio. TruPath will review Client portfolios at least annually.
- Financial Planning – TruPath provides initial and ongoing planning services, to assist Clients in meeting the financial goals.

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

TruPath does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by TruPath.

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

TruPath is a newly established advisor. Assets under management shall be reported following the Advisor's December 31, 2018 fiscal year end. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

### **A. Fees for Advisory Services**

#### Investment Management Services

Investment advisory fees are paid either monthly or quarterly (the "billing period"), at annual rate ranging from 0.25% to 1.25%. Fees may be billed in advance or arrears of the billing period, pursuant to the terms of the investment advisory agreement. Investment advisory fees are typically billed based the closing market value of the account[s] at the end of the prior billing period. Certain types of accounts are billed based the closing market value of the account[s] at the end of the current billing period.

Fees are based on several factors: including the level of assets to be managed, the scope and complexity of the Client engagement and the overall relationship. The investment advisory fee in the first billing period of service is prorated from the inception date of the account[s] to the end of the first billing period. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by TruPath will be independently valued by the Custodian. TruPath will not have the authority or responsibility to value portfolio securities.

The Client may make additions or withdrawals from the account[s] at any time, subject to the Advisor's right to terminate an account or the overall relationship. Additions may be in cash or securities provided that the Advisor reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client's account[s]. Clients may withdraw account assets on notice to TruPath, subject to the usual and customary securities settlement procedures. However, withdrawals from the Client's account[s] may impede the Advisor's ability to implement the investment strategy designed for the Client. Clients are advised that when such securities

are liquidated, they may be subject to securities transaction fees, short-term redemption fees, and/or tax ramifications.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Use of Independent Managers

For Clients with account[s] implemented through an Independent Manager, the Client will be charged a fee for the investment management and related services provided by the manager, which are separate from the Advisor's fee as noted above.

#### Financial Planning Services

TruPath may include financial planning services as part of the overall investment advisory fee or its may be offered separately. Project-based engagements may be offered at an hourly rate of up to \$250 per hour or a fixed engagement fee that typically ranges from \$1,500 to \$5,000. Ongoing financial planning engagements are offered based on the scope and complexity of the services to be provided. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and/or costs will be provided prior to engaging for these services.

#### Retirement Plan Advisory Services

Fees for retirement plan advisory services may be charged an asset-based fee at an annual rate of up to 0.50% or a fixed fee, pursuant to the terms of the retirement plan advisory agreement. Fees are billed either monthly or quarterly and may be in advance or arrears. Fees are negotiable depending on the size and complexity of the Plan. Fees in the first billing period of the engagement are prorated from the effective date of the Agreement to the end of the first billing period.

### **B. Fee Billing**

#### Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] for the respective billing period. The amount due is calculated by applying the monthly or quarterly rate to the market value of the account[s] for the respective billing period.

Clients will be provided with a statement from the Custodian, at least quarterly, reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting TruPath to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

#### Use of Independent Managers

For Clients with account[s] implemented through an Independent Manager, the Client's fee may be separately billed or deducted from the Client's account[s] by the Independent Manager.

#### Financial Planning Services

Project-based financial planning engagements may be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s]. Ongoing financial planning engagements may be invoiced up to twenty-five percent (25%) of the expected total fee upon execution of the financial planning agreement with ongoing payments at the start of each ninety (90) day period.

#### Retirement Plan Advisory Services

Fees are typically deducted from the assets of the Plan for each billing period. Fees may also be directly invoiced to the Plan Sponsor. Asset-based fees are based on the market values in each Plan Participant's account. Engagements that are billed in advance of the billing period are based on the closing market values in each Plan



Participant's account at the end of the prior billing period. Engagements that are billed at the end of the billing period are based on the closing market values in each Plan Participant's account at the end of the current billing period.

### **C. Other Fees and Expenses**

All fees paid to TruPath for investment advisory or financial planning services are separate and distinct from any and all other fees and expenses charged by broker-dealers/custodians, plan administrators, or any other expense associated with the Client's accounts. Investments in mutual funds and ETFs also have an internal expense ratio charged by the product. These fees are described in each mutual fund or ETF prospectus.

Custodians may charge securities transaction fees on purchases or sales of certain mutual funds, ETFs, individual equity securities, individual fixed income securities or other investment. They may also charge for certain services, e.g. wire transfers. See Brokerage Practices in Item 12.

### **D. Advance Payment of Fees and Termination**

#### Investment Management Services

TruPath may be compensated for its services in advance of the billing period. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will promptly refund any unearned, prepaid advisory fees. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

#### Use of Independent Managers

In the event that a Client should wish to terminate their relationship with an Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and that Independent Manager. TruPath will assist the Client with the termination and transition as appropriate.

#### Financial Planning Services

TruPath may be partially compensated for its financial planning services in advance. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for the percentage of the engagement scope completed by the Advisor. Hourly engagements will be billed the actual hours worked by the Advisor. Ongoing planning engagements are billed for the actual days worked during the period. Upon termination, the Advisor will promptly refund any unearned, prepaid fees. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

#### Retirement Plan Advisory Services

TruPath may be compensated for its retirement plan advisory services in advance of the period in which services are rendered. Either party may request to terminate their services with TruPath, at any time, by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. Upon termination, the Advisor will promptly refund any unearned, prepaid advisory fees. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's prior consent.

### **E. Compensation for Sales of Securities**

TruPath does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

However, Advisory Persons are also licensed as independent insurance professionals conducting business through . As an independent insurance professional, an Advisory Person may earn commission-based



compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by our Advisory Persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because the Advisory Person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on the Client's needs. However, the Client is under no obligation, contractually or otherwise, to purchase insurance products through any Advisory Person affiliated with the Advisor.

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

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TruPath does not charge performance-based fees for its investment advisory services. The fees charged by TruPath are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any Client.

TruPath does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

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TruPath offers investment advisory services to individuals, high net worth individuals, trusts, and estates. TruPath generally does not impose a minimum size for establishing a relationship.

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

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### **A. Methods of Analysis**

Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns. The methods of analysis, tools and strategies utilized by TruPath may include any of the following:

*Fundamental Analysis* involves evaluating a security using real data such as company revenues, earnings, return on equity, and profit margins to determine underlying value and potential growth. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk.

*Cyclical Analysis* involves analyzing the cycles of the market. Cyclical analysis may involve inflation risk, market risk, and currency risk.

*Behavioral Finance* proposes psychology-based theories to explain stock market anomalies. It assumes the information structure and the characteristics of market participants systematically influence the investment decisions of individuals as well as the market outcomes.

*Asset Allocation* is an investment strategy used to balance risk and return according to a client's investment objective, risk tolerance and investment horizon. It is used to manage portfolio volatility by investment in different asset classes.

*Diversification* is a risk management strategy used to reduce the volatility of a portfolio by investing in different asset classes, different market sectors, and/or different companies.

### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. TruPath will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. **Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

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## Item 9 – Disciplinary Information

**There are no legal, regulatory or disciplinary events involving TruPath or any of its Supervised Persons.** TruPath values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by our firm name or our CRD# 298034.

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## Item 10 – Other Financial Industry Activities and Affiliations

### Insurance Agency Affiliations

As noted in Item 5, Advisory Persons of TruPath are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with TruPath Financial. As an insurance professional, an Advisory Person may receive customary commissions and other related revenues from the various insurance companies whose products are sold. The Advisory Person is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by an Advisory Persons or the Advisor.

### Tax and Accounting Services

Certain Supervised Persons of the Advisor may also provide tax, accounting and related services through TruPath Wealth Partners, LLC, an affiliate of the Advisor. Clients may be offered the services of TruPath Wealth Partners, LLC, but are not obligated to engage for such services in order to establish or maintain an advisory relationship with the Advisor.

### Human Resource Solutions

Certain Supervised Persons of the Advisor may also provide human resources and related services through Human Resource Solutions, LLC dba TruPath HR, an affiliate of the Advisor. Clients may be offered the services of TruPath HR, but are not obligated to engage for such services in order to establish or maintain an advisory relationship with the Advisor.

### Use of Independent Managers

As noted in Item 4, the Advisor may recommend the use of one or more Independent Managers for the Client's investment portfolio. In such instances, the Advisor will only receive its advisory fee as noted in item 5.A. above. The Independent Manager may assume responsibility for calculating the overall fee and remitting the fee to the Advisor. The Advisors does not share in the fees of any Independent Manager and does not have any economic incentive to recommend one manager over another.

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

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

TruPath has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with TruPath (our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. TruPath and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of TruPath’s Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (320) 235-8065.

### **B. Personal Trading with Material Interest**

TruPath allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. TruPath does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. TruPath does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

TruPath allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by TruPath requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer (“CCO”). We have also adopted written policies and procedures to detect the misuse of material, non-public information.

### **D. Personal Trading at Same Time as Client**

While TruPath allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will TruPath, or any Supervised Person of TruPath, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

TruPath does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the “Custodian”) to safeguard Client assets and authorize TruPath to direct trades to the Custodian as agreed in the investment advisory agreement. Further, TruPath does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where TruPath does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients. Clients are not obligated to use the recommended Custodian and will not incur any extra fee or cost associated with using a broker not recommended by TruPath. However, if the recommended Custodian is not utilized the Advisor may be limited in the services it can provide to the Client comparable to other Clients. TruPath may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or location of the Custodian’s offices. TruPath will generally recommend that Clients establish their account[s] at Fidelity Clearing & Custody Solutions and related entities of Fidelity Investments, Inc. (collectively

"Fidelity"). Fidelity is a FINRA-registered broker-dealer and member SIPC and will serve as the Client's "qualified custodian". TruPath maintains an institutional relationship with Fidelity whereby the Advisor receives economic benefits from Fidelity. Please see Item 14 below.

The Advisor may also recommend that certain Clients establish accounts at AssetMark Trust Company ("ATC") or American Funds Distributors, Inc. ("American Funds").

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. **TruPath does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from Fidelity. Please see Item 14.**

**2. Brokerage Referrals** - TruPath does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where TruPath will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s], unless separately instructed by the Client. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the Custodian, TruPath will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results considering such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. TruPath will execute its transactions through the Custodian as authorized by the Client. TruPath may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of TruPath and periodically by the CCO. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify TruPath if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by TruPath**

TruPath is a fee-only advisory firm, that is compensated solely by its Clients and not from any investment product. TruPath does not receive commissions from product sponsors or broker-dealers. TruPath may refer Clients to various unaffiliated professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, TruPath may receive non-compensated referrals of new Clients from various third-parties.

#### Participation in Institutional Advisor Platform

TruPath has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. Access to the Fidelity platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor has received financial support from Fidelity to assist the Advisor in the launch of its advisory firm. The following benefits are also received from Fidelity: reimbursement to Clients for transfer costs to the platform/custodian; financing services, receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

### **B. Client Referrals from Solicitors**

TruPath does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

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All Clients must place their assets with a “qualified custodian”. Clients are required to engage the Custodian to retain their funds and securities and direct TruPath to utilize that Custodian for the Client's security transactions. TruPath does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees or authorize transfers on the Client's behalf. If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Clients should review statements provided by the Custodian and compare to any reports provided by TruPath to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see “Item 12 - Brokerage Practices”.

## **Item 16 – Investment Discretion**

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TruPath generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by TruPath. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by TruPath will be in accordance with each Client's investment objectives and goals.

## **Item 17 – Voting Client Securities**

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TruPath does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. If the Client elects to direct proxies to the Advisor, such election does not result in the authority for the Advisor to vote such proxies. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

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Neither TruPath, nor its management, have any adverse financial situations that would reasonably impair the ability of TruPath to meet all obligations to its Clients. Neither TruPath, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. TruPath is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

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

**for**

**Jonathan D. Kreps, CFP®**  
**Managing Principal and Chief Compliance Officer**

**Effective: December 16, 2018**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jonathan D. Kreps, CFP® (CRD# 3172799) in addition to the information contained in the TruPath Financial Group, LLC (“TruPath” or the “Advisor”, CRD# 298034) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the TruPath Disclosure Brochure or this Brochure Supplement, please contact us at (320) 235-8065.

Additional information about Mr. Kreps is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 3172799.



## Item 2 – Educational Background and Business Experience

Jonathan D. Kreps, CFP®, born in 1975, is its Managing Principal and Chief Compliance Officer for TruPath. Mr. Kreps earned a Bachelors in Finance from the St. Cloud State University in 1998. Mr. Kreps earned an Associate in Arts from Willmar Community College in 1996. Additional information regarding Mr. Kreps's employment history is included below.

### Employment History:

Managing Principal and Chief Compliance Officer, TruPath Financial Group, LLC	01/2019 to Present
Managing Principal, TruPath Wealth Partners, LLC	01/2019 to Present
Principal, Human Resource Solutions, LLC dba TruPath HR	01/2019 to Present
Financial Advisor, Sagepoint Financial, Inc.	01/2009 to 01/2019
Owner and Chief Executive Officer, J.D. Kreps Financial Group, Inc.	01/1999 to 12/2018

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Kreps.*** Mr. Kreps has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Kreps. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Kreps.*** However, we do encourage you to independently view the background of Mr. Kreps on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 3172799.

### Item 4 – Other Business Activities

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#### Insurance Agency Affiliations

Mr. Kreps is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Kreps's role with TruPath. As an insurance professional, Mr. Kreps may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Kreps is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Kreps or the Advisor.

#### Tax and Accounting Services

Mr. Kreps also provides tax, accounting and related services through TruPath Wealth Partners, LLC, an affiliate of the Advisor. Clients may be offered the services of TruPath Wealth Partners, LLC, but are not obligated to engage for such services in order to establish or maintain an advisory relationship with the Advisor.

#### Human Resource Solutions

Mr. Kreps also provides human resources and related services through Human Resource Solutions, LLC dba TruPath HR, an affiliate of the Advisor. Clients may be offered the services of TruPath HR, but are not obligated to engage for such services in order to establish or maintain an advisory relationship with the Advisor.

#### Real Estate Holdings

Mr. Kreps is also an owner of JD Kreps Properties. Mr. Kreps provides real estate services. Mr. Kreps spends less than 5% of his time at this business activity. Clients are not offered these services.

#### Board Member/Treasurer

Mr. Kreps is also a Board Member and Treasurer for Rice Health Foundation, a non-profit organization. Mr. Kreps assists the local hospital in philanthropy to support the services and programs in a low-margin environment. Mr. Kreps spends two hours per month supporting this non-profit organization.

### Item 5 – Additional Compensation

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Mr. Kreps has additional business activities that are detailed in Item 4 above.

### Item 6 – Supervision

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Mr. Kreps serves as the Managing Principal and Chief Compliance Officer of TruPath. Mr. Kreps can be reached at (320) 235-8065.

TruPath has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of TruPath. Further, TruPath is subject to regulatory oversight by various agencies. These agencies require registration by TruPath and its Supervised Persons. As a registered entity, TruPath is subject to examinations by regulators, which may be announced or unannounced.

TruPath is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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

**for**

**Todd W. Ahrenholz, CFP®  
Investment Advisor Representative**

**Effective: December 16, 2018**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Todd W. Ahrenholz, CFP® (CRD# 5603346) in addition to the information contained in the TruPath Financial Group, LLC (“TruPath” or the “Advisor”, CRD# 298034) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the TruPath Disclosure Brochure or this Brochure Supplement, please contact us at (320) 235-8065.

Additional information about Mr. Ahrenholz is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5603346.

## Item 2 – Educational Background and Business Experience

Todd W. Ahrenholz, CFP®, born in 1971, is an Investment Advisor Representative for TruPath. Mr. Ahrenholz earned a Bachelor of Science from the North Central University in 1995. Additional information regarding Mr. Ahrenholz's employment history is included below.

### Employment History:

Investment Advisor Representative, TruPath Financial Group, LLC	01/2019 to Present
Financial Advisor, Sagepoint Financial, Inc.	01/2009 to 01/2019
Financial Advisor, J.D. Kreps Financial Group, Inc.	01/2009 to 12/2018

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

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The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Ahrenholz.*** Mr. Ahrenholz has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Ahrenholz. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Ahrenholz.*** However, we do encourage you to independently view the background of Mr. Ahrenholz on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5603346.

### Item 4 – Other Business Activities

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#### Insurance Agency Affiliations

Mr. Ahrenholz is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Ahrenholz's role with TruPath. As an insurance professional, Mr. Ahrenholz may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Ahrenholz is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Ahrenholz or the Advisor.

#### Finance/Gifts Committee Member

Mr. Ahrenholz is also a Finance/Gift Committee Member for the Central MN Christian School. Mr. Ahrenholz will be contacting donors to help fund the building of a new elementary school. Mr. Ahrenholz spends approximately three hours per month support this non-profit organization.

#### Basketball Official

Mr. Ahrenholz is also a basketball official for MN State High School League. Mr. Ahrenholz travels to different high schools and referee basketball games in the evening. Mr. Ahrenholz spends approximately 10 hours per month at this activity.

#### Deacon Board Member

Mr. Ahrenholz is also a deacon board member for Willmar Assembly of God. Mr. Ahrenholz provides guidance to the pastoral staff of the church. Mr. Ahrenholz spends approximately eight hours per month at this activity.

### Item 5 – Additional Compensation

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Mr. Ahrenholz has additional business activities that are detailed in Item 4 above.

### Item 6 – Supervision

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Mr. Ahrenholz serves as an Investment Advisor Representative of TruPath and is supervised by Jonathan Kreps, the Chief Compliance Officer. Mr. Kreps can be reached at (320) 235-8065.

TruPath has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of TruPath. Further, TruPath is subject to regulatory oversight by various agencies. These agencies require registration by TruPath and its Supervised Persons. As a registered entity, TruPath is subject to examinations by regulators, which may be announced or unannounced. TruPath is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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

**for**

**Scott J. Kragh, CFP®  
Investment Advisor Representative**

**Effective: December 16, 2018**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Scott J. Kragh, CFP® (CRD# 6279856) in addition to the information contained in the TruPath Financial Group, LLC (“TruPath” or the “Advisor”, CRD# 298034) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the TruPath Disclosure Brochure or this Brochure Supplement, please contact us at (320) 235-8065.

Additional information about Mr. Kragh is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6279856.



## Item 2 – Educational Background and Business Experience

Scott J. Kragh, CFP®, born in 1976, is dedicated to advising Clients of TruPath as an Investment Advisor Representative. Mr. Kragh earned an Associate in Arts from Willmar Community College in 1996. Mr. Kragh also earned a Bachelors in Finance from the St Cloud State University in 1999. Additional information regarding Mr. Kragh's employment history is included below.

### Employment History:

Investment Advisor Representative, TruPath Financial Group, LLC	01/2019 to Present
Financial Advisor, Sagepoint Financial, Inc.	04/2014 to 01/2019
Staff Member, J.D. Kreps Financial Group, Inc.	11/2013 to 12/2018
Sales Manager, Nystorm Inc.	09/2004 to 11/2013

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

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The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Kragh.*** Mr. Kragh has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Kragh. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Kragh.*** However, we do encourage you to independently view the background of Mr. Kragh on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6279856.

### Item 4 – Other Business Activities

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#### Insurance Agency Affiliations

Mr. Kragh is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Kragh's role with TruPath. As an insurance professional, Mr. Kragh may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Kragh is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Kragh or the Advisor.

### Item 5 – Additional Compensation

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Mr. Kragh has additional business activities that are detailed in Item 4 above.

### Item 6 – Supervision

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Mr. Kragh serves as an Investment Advisor Representative of TruPath and is supervised by Jonathan Kreps, the Chief Compliance Officer. Mr. Kreps can be reached at (320) 235-8065.

TruPath has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of TruPath. Further, TruPath is subject to regulatory oversight by various agencies. These agencies require registration by TruPath and its Supervised Persons. As a registered entity, TruPath is subject to examinations by regulators, which may be announced or unannounced. TruPath is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

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Effective: December 16, 2018

### Our Commitment to You

TruPath Financial Group, LLC ("TruPath" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. TruPath (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

TruPath does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, broker-dealers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. The Advisor may also share the Client's information with affiliated entities of the Advisor.	Yes	No
<b>Marketing Purposes</b> TruPath does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where TruPath or the Client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> TruPath does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (320) 235-8065.