

Three Cord True Wealth Management, LLC

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This Brochure provides information about the qualifications and business practices of Three Cord True Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 724-683-3450. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Registration with the SEC does not imply a certain level of skill or training.

Additional information about Three Cord True Wealth Management, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

This is Three Cord True Wealth Management, LLC's initial filing for Form ADV Part 2A.

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Item 4: Advisory Business

Three Cord True Wealth Management, LLC (“TCTWM” or “Adviser”) was established in 2020 and provides comprehensive financial planning and wealth management services to individuals, professionals, business owners, corporate executives, retirement plans and businesses. The principal owner of TCTWM is Tod Arbutina.

As a registered investment adviser subject to Section 206 of the Advisers Act, TCTWM acts as a Fiduciary related to the conduct of its investment advisory services. As such TCTWM has an obligation to act in the best interest of its Clients guided by the core fiduciary duties of loyalty and care.

TCTWM provides advisory services through certain programs sponsored by LPL Financial LLC (LPL), a registered investment adviser and broker-dealer. Below is a brief description of each advisory service available to Clients of TCTWM. For more information regarding the LPL programs, including more information on the advisory services and fees that apply, the types of investments available in the programs and the potential conflicts of interest presented by the programs please see the LPL program account packet (which includes the account agreement and LPL Form ADV program brochure) and the Form ADV, Part 2A of LPL or the applicable program.

Advisory Services

Strategic Wealth Management Program (SWM II)

TCTWM offers asset management services based on the individual needs of the Client. In the SWM II program, TCTWM provides ongoing investment advice and management on assets in the Client’s account. TCTWM will have discretion to purchase and sell various types of investments, such as mutual funds, exchange-traded funds (“ETFs”), variable annuity subaccounts, equities, and fixed income securities. TCTWM provides advice that is tailored to the individual needs of the Client based on the investment objective chosen by the Client. Clients can impose restrictions on investing in certain securities or groups of securities by indicating in the written advisory agreement with TCTWM.

Retirement Plan Services

TCTWM assist Clients that are trustees or other fiduciaries to retirement plans (“Plans”) by providing fee-based consulting and/or advisory services. TCTWM whom the trustee or other plan fiduciary appoints in its retirement plan consulting services agreement with TCTWM will serve as ERISA Section 3(21) fiduciary to the Retirement Plan (the “Plan”). TCTWM IARs will perform certain limited scope investment advisory services for the Plan pursuant to and consistent with Section 3(21) of ERISA (as opposed to Investment Management services pursuant to and consistent with Section 3(38) of ERISA). In short, TCTWM provides advisory and consulting services on a non-discretionary basis, so that the Client makes the decisions regarding the

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purchase and sale of securities and the investment options to be made available in the Plan. TCTWM does not exercise authority over the administration of the Plan.

IRA Rollovers

Investors considering rolling over assets from a qualified employer-sponsored retirement plan ("Employer Plan") to an Individual Retirement Account ("IRA") should review and consider the advantages and disadvantages of an IRA rollover from their Employer Plan. A plan participant leaving an employer typically has four options (and can engage in a combination of these options):

- (1) Leave the money in the former employer's plan, if permitted;
- (2) Rollover the assets to a new employer's plan (if available and rollovers are permitted);
- (3) Rollover Employer Plan assets to an IRA; or,
- (4) Cash out the Employer Plan assets and pay the required taxes on the distribution.

At a minimum, Investors should consider fees and expenses, investment options, services, penalty-free withdrawals, protection from creditors and legal judgments, required minimum distributions, and employer stock. TCTWM encourages you to discuss your options and review the above listed considerations with an accountant, third-party administrator, investment adviser to your Employer Plan (if available), or legal counsel, to the extent you consider necessary.

By recommending that you rollover your Employer Plan assets to an IRA advised by TCTWM, the Adviser will earn fees as a result. In contrast, leaving assets in your Employer Plan or rolling the assets to a plan sponsored by your new employer likely results in little or no compensation to TCTWM. TCTWM has an economic incentive to encourage investors to rollover Employer Plan assets into an IRA managed by TCTWM. Investors can face increased fees when they move retirement assets from an Employer Plan to a Rollover IRA account. Even if there are no costs associated with the IRA rollover itself, there will be costs associated with account administration, investment management, or both. In addition to the fees charged by TCTWM, the underlying investment (mutual fund, ETF, annuity, or other investment) can also include fees. Custodial and trading fees also apply. Investing in an IRA with TCTWM will typically be more expensive than an Employer Plan.

Additional resources about IRA Rollovers are available to investors through FINRA's web site at www.finra.org.

TCTWM is registered with the SEC, anticipating meeting the regulatory assets under management requirements within 120 days from its SEC effective date.

Item 5: Fees and Compensation

Strategic Wealth Management Program (SWM II) Fees

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Clients enter into an Investment Management Agreement (“IMA”) with TCTWM that outlines the services provided and fees paid to TCTWM. The Client will pay an asset management fee to TCTWM based on the value of the Client’s SWM II account, including cash holdings. Clients are billed in advance on a quarterly basis based on the account value on the last day of the prior quarter. Clients will be billed at the rate set forth in their agreement. Fees range from .7% to 1.3% annually. For the initial period of an engagement, the fee is calculated on a pro rata basis. In the event the IMA is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is refunded to the Client. SWM II accounts are a wrap fee program sponsored by TCTWM. Clients should review the separate TCTWM Wrap Fee Program Brochure for more detail about the fees and expenses related to this program.

Fee Discretion

TCTWM, in its sole discretion, negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy Client relationship, employer-employee relationship, account retention and pro bono activities. TCTWM will group certain related Client accounts for the purposes of determining the fee.

Direct Fee Debit

Clients generally provide TCTWM and/or certain Independent Managers with the authority to directly debit their accounts for payment of the investment advisory fees. The financial institutions that act as the qualified custodian for Client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to Clients not less than quarterly detailing all account transactions, including any amounts paid to TCTWM.

Additional Fees and Expenses

In addition to the advisory fees paid to TCTWM, Clients also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively "Financial Institutions"). These additional charges include, but aren’t limited to, securities brokerage commissions, transaction fees, redemption fees, short term transaction fees, custodial fees, overnight carrier fees for certain deliveries, early settlement fees when a Client wishes to exit investment positions in order to withdraw cash, fees charged by the Independent Managers, margin costs, charges imposed directly by a mutual fund or ETF in a Client’s account, as disclosed in the fund’s prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. The Firm’s brokerage practices are described at length in Item 12, below. Other fees are disclosed in the TCTWM Wrap Fee Program Brochure, IMA and LPL account documents.

Certain Conflicts of Interest

TCTWM receives compensation as a result of a Client’s participation in an LPL program. Depending on, among other things, the type and size of the account, type of securities held in the account, changes in its value over time, the ability to negotiate fees or commissions, the

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historical or expected size or number of transactions, and the number and range of supplementary advisory and client-related services provided to the Client, the amount of this compensation will be more or less than what the TCTWM would receive if the Client participated in other programs, whether through LPL or another sponsor, or paid separately for investment advice, brokerage and other services.

SWM Conflicts

Although Clients do not pay a transaction charge for transactions in a SWM II account, Clients should be aware that TCTWM pays LPL transaction charges for those transactions. The transaction charges paid by TCTWM vary based on the type of transaction (e.g., mutual fund, equity or ETF) and for mutual funds based on whether or not the mutual fund pays 12b-1 fees and/or recordkeeping fees to LPL. Transaction charges paid by the Adviser for equities and ETFs are \$9. For mutual funds, the transaction charges range from \$0 to \$26.50. Because TCTWM pays the transaction charges in SWM II accounts, there is a conflict of interest in cases where the mutual fund is offered at both \$0 and \$26.50. Clients should understand that the cost to the Adviser of transaction charges is a factor that TCTWM considers when deciding which securities to select and how frequently to place transactions in a SWM II account.

In many instances, LPL makes available mutual funds in a SWM II account that offer various classes of shares, including shares designated as Class A Shares and shares designed for advisory programs, which can be titled, for example, as "Class I," "institutional," "investor," "retail," "service," "administrative," "platform" or "Adviser" share class. The Adviser Share Class offered for a particular mutual fund in SWM II in many cases will not be the least expensive share class that the mutual fund makes available, and was selected by LPL in certain cases because the share class pays LPL compensation for the administrative and recordkeeping services LPL provides to the mutual fund. Clients should understand that another financial services firm can offer the same mutual fund at a lower overall cost to the investor than is available through SWM II. In other instances, a mutual fund may offer only Class A Shares, but another similar mutual fund is available that offers a less expensive share class. Class A Shares typically pay LPL a 12b-1 fee for providing shareholder services, distribution, and marketing expenses ("brokerage-related services") to the mutual funds. Adviser Share Class funds generally are not subject to 12b-1 fees.

TCTWM has a financial incentive to recommend share classes that have the lowest trading costs in cases where various share classes are available. This is a conflict of interest which might incline TCTWM, consciously or unconsciously, to render advice that is not disinterested. Although the Client will not be charged a transaction charge for transactions, the Adviser pays LPL a per transaction charge for mutual fund trades in your account. TCTWM does not pay transaction charges for certain share classes that "Fully Participate" on the LPL platform, but generally does pay transaction charges for other share classes that are "Non-Participating". This creates an incentive for TCTWM to select Fully Participating funds. Clients should note that Fully Participating funds can be more expensive than Non-Participating funds. Furthermore, as noted above, the share classes available may not be the least expensive share class offered by the fund company. The cost to TCTWM of transaction charges is a factor the Adviser considers when

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deciding which securities to select and whether or not to place transactions in the account.

The lack of transaction charges to TCTWM for Fully Participating share class purchases and sales, together with the fact that other shares have a trading cost, presents a conflict of interest between TCTWM and the Client. In short, it costs TCTWM less to recommend and select Fully Participating mutual funds than Non-Participating funds. Clients should understand this conflict and consider the additional indirect expenses borne as a result of the mutual fund fees when negotiating and discussing with your Adviser the advisory fee for management of an account. Certain conflicts of interest arise with financial planning when TCTWM recommends a course of action that will benefit the Adviser.

Limitations:

The individuals that are licensed as registered representatives of LPL Financial are subject to regulations that restrict them from conducting securities transactions away from LPL Financial without written authorization from LPL Financial. Clients should, therefore, be aware that for accounts where LPL Financial serves as the custodian, TCTWM is limited to offering services and investment vehicles that are approved by LPL Financial, and require pre-approval for offering services and investment vehicles that may be available through other broker/dealers and custodians of which approval is not guaranteed.

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

TCTWM does not charge performance-based fees.

Item 7: Types of Clients

As noted in Item 4, TCTWM provides wealth management services to individuals, professionals, business owners, corporate executives, retirement plans and businesses. There are no minimum account values for the SWM II advisory program accounts.

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

TCTWM has access to various research reports and model portfolios to which they utilize on a periodic basis in determining investment advice provided to Clients. TCTWM chooses from various research methods, investment styles and management philosophies. It is important to note that no methodology or investment strategy is guaranteed to be successful or profitable.

TCTWM receives research and investment recommendations regarding asset allocation, mutual funds, variable annuity subaccounts and money managers from LPL's Research Department and other vendors. TCTWM does not consider all these recommendations in providing investment advice. LPL Research also constructs asset allocation model portfolios and provides recommendations on the funds to populate those models.

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We believe a diversified portfolio that is consistent with your risk tolerance, time horizon and goals and objectives is essential. Our financial professionals ensure you are educated on your choices, and we personally engage with you to keep connected and assure that your portfolio is aligned with your financial plan. Your unique circumstances and personal objectives dictate the method of investing, as well as the types of strategies chosen.

Asset Allocation: Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of mutual funds, ETFs, equities, fixed income, cash, and other investments suitable to the client's investment goals and risk tolerance. Additionally, we incorporate an analysis of current market data and valuations of various market sectors and asset categories to identify investment opportunities as well as pitfalls.

A risk of asset allocation is that the client does not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to market movements and, if not corrected, will no longer be appropriate for the client's goals. The expected risk and return of various asset classes differ and a clients' results will be effected by our selection of various asset classes.

Mutual Fund and/or ETF Analysis: We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other fund(s) in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful is not guaranteed to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client can purchase or hold the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager deviates from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

Risks:

All investments in securities include a risk of loss of your principal (invested amount) and any profits that have not been realized. Stock markets and bond markets fluctuate substantially over time. In addition, the performance of any investment is not guaranteed.

Types of Investments and Risks

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Depending on the type of service being provided, TCTWM can recommend different types of securities, including mutual funds, unit investment trusts ("UITs"), closed end funds, ETFs, collective investment trusts, variable annuity subaccounts, equities, fixed income securities, options, hedge funds, managed futures, and structured products. Investing in securities involves the risk of loss that clients should be prepared to bear. Described below are some risks associated with investing and with some types of investments that an IAR can recommend depending on the service provided.

- **Market Risk.** This is the risk that the value of securities owned by an investor goes up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries.
- **Interest Rate Risk.** This is the risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.
- **Credit Risk.** This is the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.
- **Issuer-Specific Risk.** This is the risk that the value of an individual security or particular type of security can be more volatile than the market as a whole and can perform differently from the value of the market as a whole.
- **Investment Company Risk.** To the extent a client account invests in ETFs or other investment companies, its performance will be affected by the performance of the investment managers and the underlying portfolio holdings. Investments in ETFs and other investment companies are subject to the risks of the investment companies' investments, as well as to the investment companies' expenses. If a client account invests in other investment companies, the client account can receive distributions of taxable gains from portfolio transactions by that investment company and recognize taxable gains from transactions in shares of that investment company, which would be taxable when distributed.
- **Equity Investment Risk.** Our judgments about the attractiveness, value and potential appreciation of a particular individual security, if incorrect, there is no guarantee that individual securities will perform as anticipated. Sharp downward market moves adversely impact long positions. There is a risk of loss on individual positions as a result of issuer-specific matters such as unexpectedly disappointing earnings, lawsuits, analyst action or other matters. Equity returns are volatile and fluctuate, sometimes substantially, over time.
- **Bond Risk.** Rising interest rates will generally cause the prices of bonds and other debt securities to fall. In addition, falling interest rates can result in an issuer redeeming, calling or refinancing a security before its stated maturity. Longer maturity debt securities are subject to greater price fluctuations than shorter maturity debt securities. Bonds and other debt securities are subject to credit risk, which is the possibility that the credit strength of an issuer will weaken and/or an issuer of a debt security will fail to make timely

payments of principal or interest and the security will go into default. Lower quality debt securities generally have higher rates of interest and are subject to greater price fluctuations than higher quality debt securities.

- **Concentration Risk.** To the extent a client account concentrates its investments by investing a significant portion of its assets in the securities of a single issuer, industry, sector, country or region, the overall adverse impact on the client of adverse developments in the business of such issuer, such industry or such government could be considerably greater than if they did not concentrate their investments to such an extent.
- **Sector Risk.** To the extent a client account invests more heavily in particular sectors, industries, or sub-sectors of the market, its performance will be especially sensitive to developments that significantly affect those sectors, industries, or sub-sectors. An individual sector, industry, or sub-sector of the market can be more volatile, and perform differently, than the broader market. The several industries that constitute a sector can all react in the same way to economic, political or regulatory events. A client account's performance could be affected if the sectors, industries, or sub-sectors do not perform as expected. Alternatively, the lack of exposure to one or more sectors or industries can adversely affect performance.
- **Alternative Strategy Mutual Funds.** Certain mutual funds invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies is not be suitable for all investors and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund's concentration in the real estate industry. These types of funds tend to have higher expense ratios than more traditional mutual funds. They also tend to be newer and have less of a track record or performance history.
- **Closed-End/Interval Funds.** Clients should be aware that closed-end funds available within the program can restrict an investor's right to redeem their shares, and a secondary market may not exist causing the inability for clients to liquidate all or a portion of their shares in these types of funds. While the fund can from time to time offer to repurchase shares, it is not obligated to do so (unless it has been structured as an "interval fund"). In the case of interval funds, the fund will provide limited liquidity to shareholders by offering to repurchase a limited amount of shares on a periodic basis, but there is no guarantee that clients will be able to sell all of the shares in any particular repurchase offer. The repurchase offer program can be suspended under certain circumstances.
- **Exchange-Traded Funds (ETFs).** ETFs are typically investment companies that are legally classified as open end mutual funds or UITs. However, they differ from traditional mutual funds, in particular, in that ETF shares are listed on a securities

exchange. Shares can be bought and sold throughout the trading day like shares of other publicly-traded companies. ETF shares trade at a discount or premium to their net asset value. This difference between the bid price and the ask price is often referred to as the “spread.” The spread varies over time based on the ETF’s trading volume and market liquidity, and is generally lower if the ETF has a lot of trading volume and market liquidity and higher if the ETF has little trading volume and market liquidity. Although many ETFs are registered as an investment company under the Investment Company Act of 1940 like traditional mutual funds, some ETFs, in particular those that invest in commodities, are not registered as an investment company. ETFs can be closed and liquidated at the discretion of the issuing company.

- **Exchange-Traded Notes (ETNs).** An ETN is a senior unsecured debt obligation designed to track the total return of an underlying market index or other benchmark. ETNs are linked to a variety of assets, for example, commodity futures, foreign currency and equities. ETNs are similar to ETFs in that they are listed on an exchange and can typically be bought or sold throughout the trading day. However, an ETN is not a mutual fund and does not have a net asset value; the ETN trades at the prevailing market price. Some of the more common risks of an ETN are as follows: The repayment of the principal, interest (if any), and the payment of any returns at maturity or upon redemption are dependent upon the ETN issuer’s ability.
- **Variable Annuities.** If client purchases a variable annuity that is part of the program, client will receive a prospectus and should rely solely on the disclosure contained in the prospectus with respect to the terms and conditions of the variable annuity. Client should also be aware that certain riders purchased with a variable annuity limit the investment options and the ability to manage the subaccounts.

It is important to note that no methodology or investment strategy is guaranteed to be successful or profitable. Investing in securities involves the risk of loss that clients should be prepared to bear.

Item 9: Disciplinary Information

TCTWM has no legal or disciplinary events to report that would impact the evaluation by a client or investor (or potential client or investor) of TCTWM’s advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities and Affiliations

Certain financial professionals of TCTWM are registered representatives (“Registered Reps”) of LPL Financial. LPL Financial is a broker-dealer that is independently owned and operated and is not affiliated with TCTWM. Registered Reps, in their separate capacity, can affect securities

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transactions for which they receive separate, yet customary compensation. There are circumstances where Registered Reps recommend brokerage services or products to clients. When clients purchase brokerage services or products through a Registered Rep who is an employee of TCTWM the employee will earn compensation from LPL. This practice presents a conflict of interest and gives Registered Reps an incentive to recommend brokerage services and products based on the compensation received, rather than on the client needs. Clients have the option to purchase brokerage services and products through other brokers or agents that are not affiliated with TCTWM. While TCTWM and Registered Reps endeavor at all times to put the interest of the clients first as part of our fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest when making recommendations. TCTWM addresses this conflict by disclosing to clients when they are acting as a registered representative and the brokerage commissions and other fees. Client will receive notification of brokerage charges from LPL.

Tod Arbutina, President of TCTWM, is a Certified Public Accountant and a partner of Horovitz Rudoy & Roteman, LLC d/b/a "H2R CPAs" which is a certified public accounting firm. To the extent that Mr. Arbutina provides accounting and/or tax preparation services to any clients, including clients of TCTWM, all such services shall be performed by H2R CPAs in its individual professional capacity, independent of TCTWM, for which services TCTWM shall not receive any portion of the fees charged by H2R CPAs, referral or otherwise. It is expected that the shareholders of the accounting firm, solely incidental to their respective practices as Certified Public Accountants, shall recommend TCTWM's services to certain of its clients. H2R CPAs is not involved in providing investment advice on behalf of TCTWM, nor does H2R CPAs hold itself out as providing advisory services on behalf of TCTWM. No client of TCTWM is under any obligation to use the services of H2R CPAs and can engage a non-affiliated Certified Public Accountant.

Certain financial professionals are also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from one's role with TCTWM. Commissions and other related revenues from the various insurance companies whose products are sold are received by the insurance professional. The insurance professional ensures that the implementation of recommendations to the Client is done in the best interest of the Client. The insurance professionals are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset advisory fees. This causes a conflict of interest in recommending certain products of the insurance companies. Clients always have the right to choose whether to implement any recommendations made with any insurance professional.

Please refer to Item 12 for a discussion of the benefits TCTWM receives from LPL Financial and the conflicts of interest associated with receipt of such benefits.

Item 11: Code of Ethics

TCTWM has adopted a Code of Ethics for all supervised persons of the Firm describing its high standards of business conduct and fiduciary duty to its clients. The Code includes provisions relating to the confidentiality of client information, a prohibition on insider trading, guidelines surrounding gifts and business entertainment items, personal securities trading, conflicts of interest, among other things. All supervised persons must acknowledge the terms of the Code initially upon hire as well as annually, or as amended.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with making decisions in the best interest of advisory clients.

Employees are permitted to maintain personal securities accounts provided any personal investing by an employee in any accounts in which the employee has a beneficial interest is consistent with the Firm's personal trading guidelines and applicable regulatory requirements. Employees of the firm are permitted to buy or sell for their personal accounts securities similar to those recommended to or owned by clients. All reportable transactions are reported to the Compliance Officer in accordance with the reporting requirements outlined in the Code and personal trading is monitored in order to reasonably prevent conflicts of interest between TCTWM and its clients.

Adviser does not engage in principal transactions with its clients in program accounts. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

Item 12: Brokerage Practices

TCTWM recommends Clients use LPL as their custodian. TCTWM does not have the discretion to select a broker/dealer or commission rates. Clients have the discretion to use LPL or at an LPL approved custodian for their accounts, as long as TCTWM has received pre-approval from LPL's RIA Compliance Group. Because associated persons of TCTWM are licensed with LPL, this presents a conflict of interest. Clients should understand that not all advisers require their clients to select a certain broker. By selecting LPL as the broker, the most favorable execution of client transactions is not guaranteed and this practice can cost clients more money. TCTWM maintains a service relationship with LPL. Clients will be subject to separate fees and expenses charged by their custodians.

TCTWM receives support services and/or products from LPL Financial, many of which assist TCTWM to better monitor and service program accounts maintained at LPL Financial; however, some of the services and products benefit TCTWM and not client accounts. These support services and/or products are received without cost, at a discount, and/or at a negotiated rate, and include the following:

- investment-related research

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- pricing information and market data
- software and other technology that provide access to client account data
- compliance and/or practice management-related publications
- consulting services
- attendance at conferences, meetings, and other educational and/or social events
- marketing support
- computer hardware and/or software
- other products and services used by TCTWM in furtherance of its investment advisory business operations

LPL Financial provides these services and products directly, or may arrange for third party vendors to provide the services or products to Adviser. In the case of third-party vendors, LPL Financial may pay for some or all of the third party's fees.

These support services are provided to TCTWM based on the overall relationship between TCTWM and LPL Financial. It is not the result of soft dollar arrangements or any other express arrangements with LPL Financial that involves the execution of client transactions as a condition to the receipt of services. TCTWM will continue to receive the services regardless of the volume of client transactions executed with LPL Financial. Clients do not pay more for services as a result of this arrangement. There is no corresponding commitment made by the TCTWM to LPL or any other entity to invest any specific amount or percentage of client assets in any specific securities as a result of the arrangement. However, the receipt of these benefits from LPL Financial creates a conflict of interest. The receipt of these products and services presents a financial incentive for TCTWM to recommend that its clients use LPL Financial's custodial platform rather than another custodian's platform.

Soft Dollar Arrangements: TCTWM does not receive research or other products or services other than execution from a broker-dealer or a third party in connection with client securities transactions.

Brokerage for Client Referrals: TCTWM does not recommend broker-dealers to clients based on our interest in receiving client referrals.

Trade Allocation and Aggregation: TCTWM generally does not aggregate orders for client accounts but rather enter orders on a client by client basis at the discretion of the client's respective Adviser. TCTWM will aggregate if an entire position is being bought or sold across multiple accounts invested in the same allocation program. For accounts custodied at LPL, Client accounts participating in a block trade will not be favored over any other Client account; instead will participate in an aggregated order at the average share price.

Item 13: Review of Accounts

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TCTWM meets with most clients on at least an annual basis. All SWMII program accounts are subjected to a risk-based exception reporting system that flags accounts on a quarterly basis for criteria such as performance, trading activity, and concentration. The exception reporting identifies accounts where additional scrutiny or analysis by TCTWM is appropriate.

During any month that there is activity in the program account, client will receive a monthly account statement from LPL showing account activity as well as positions held in the account at month end. Additionally, client will receive a confirmation of each transaction that occurs within the program account unless the transaction is the result of a systematic purchase, redemption or exchange. Clients will also receive a detailed quarterly report showing performance, positions and activity from LPL.

Item 14: Client Referrals and Other Compensation

TCTWM does not compensate any unrelated persons for client referrals.

Item 15: Custody

TCTWM does not maintain physical possession of client cash and/or securities. TCTWM is deemed to have custody of client assets (as defined by the Adviser's Act) when TCTWM directly deducts client fees from the client's account and because certain clients have executed standing letters of authorization ("SLOA") for distributions.

TCTWM has implemented procedures to meet the specific conditions as stated in the SEC's SLOA no action letter under which the obligation to obtain a surprise examination is waived. Each custodian holding client assets sends statements directly to the account owners on at least a quarterly basis.

Cash and securities are maintained at LPL Financial or other custodians, each a qualified custodian within the meaning of the Adviser's Act. Clients will receive account statements directly from a qualified custodian at least quarterly and should carefully review those statements. We urge clients to compare the account statements received from the custodian with the reports they receive from TCTWM.

Item 16: Investment Discretion

TCTWM provides management services on a discretionary basis. The client authorizes the Adviser to have discretion by signing an Investment Management Agreement.

Item 17: Voting Client Securities

TCTWM does not accept proxy voting authority with respect to client securities

Item 18: Financial Information

Registered investment advisers are required to provide you with certain financial information or disclosures about the firm's financial condition. TCTWM does not require or solicit prepayment of fees more than six months in advance. Additionally, TCTWM has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been subject to a bankruptcy proceeding.