

# **1. Cover Page**

## **Firm Brochure & Supplement** (Parts 2A and 2B of Form ADV)

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This brochure provides information about the qualifications and business practices of Trisperity Advisors. If you have any questions about the contents of this brochure, please contact us at: 281-395-1021, or by email at: [craig@trisperity.com](mailto:craig@trisperity.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Trisperity Advisors is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

December 31, 2019

## 2. Material Changes

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### **Annual Update**

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

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### **Material Changes since the Last Update**

Organized the document to better align with SEC guidelines for section numbers and section content.

Show more detail in the Advisory Business section by breaking out discretionary and non-discretionary assets under management.

Added more details in the Fees and Compensation section to describe how fee billing is prorated for assets that are added or withdrawn during a quarter.

Added more details in the Fees and Compensation section to describe how all accounts for a client household portfolio are aggregated for the fee calculation for purposes of achieving a reduced percentage fee.

Added detail to the Code of Ethics section to summarize key principles in the performance of our professional services.

Added a new Mutual Fund Share Class Selections sub section to the Brokerage Practices section to describe trading practices related to mutual fund share class recommendations and selections.

Added more detail in the Order Aggregation sub section of the Brokerage Practices section to describe trading practices related to the aggregation of securities orders for trade execution.

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### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 281-395-1021 or by email at: [craig@trisperity.com](mailto:craig@trisperity.com).

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## 4. Advisory Business

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### **Firm Description**

Trisperity Advisors, LLC (“Trisperity Advisors”) was founded in 2006 as Trisperity Wealth Advisory Group, LLC. The name was changed after an ownership adjustment in 2010.

Trisperity Advisors provides personalized confidential financial planning and investment management to individuals, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Trisperity Advisors is a fee-only financial planning and investment management firm. The firm does not earn sales commissions for selling annuities, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted for investments. No finder’s fees are accepted.

Investment advice is an integral part of financial planning. In addition, Trisperity Advisors advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning.

Investment advice is provided, with the client making the final decision on investment selection, unless otherwise specified in writing. Trisperity Advisors does not act as a custodian of client assets. The client always maintains asset control. Trisperity Advisors places trades for clients under a limited power of attorney.

A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement or Investment Policy Statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

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**Principal Owners**

Craig Narum is a 100% stockholder.

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**Types of Advisory Services**

Trisperity Advisors provides investment supervisory services, also known as asset management services; furnishes investment advice through consultations; and provides, charts, graphs, formulas, or other devices which clients may use to evaluate securities.

On more than an occasional basis, Trisperity Advisors furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of December 31, 2019, Trisperity Advisors manages approximately \$168.1 million in assets for 196 clients. Client assets are managed on both a discretionary (\$164.6 million) and non-discretionary basis (\$3.5 million), depending on the agreement between Trisperity and the client.

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**Tailored Relationships**

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

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**Types of Agreements**

The following agreements define the typical client relationships.

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**Financial Planning Agreement**

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

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### **Advisory Service Agreement**

Most clients choose to have Trisperity Advisors manage their assets in order to obtain ongoing in-depth advice and life planning. When in-depth advice and life planning is requested, all aspects of the client's financial affairs are reviewed, including those of their children. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. An Advisory Service Agreement could include: cash flow management; insurance review; investment management (including performance reporting); education planning; retirement planning; and estate planning, as well as the implementation of recommendations within each area.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

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### **Retainer Agreement**

In some circumstances, a *Retainer Agreement* is executed in lieu of an *Advisory Service Agreement* when it is more appropriate to work on a fixed-fee basis.

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### **Hourly Planning Engagements**

Trisperity Advisors provides hourly planning services for clients who need advice on a limited scope of work.

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### **Asset Management**

Assets can be invested in no-load or load-waived mutual funds and exchange-traded funds, usually through fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus.

Stocks and bonds may be purchased or sold through the custodian of a client account when appropriate. The custodian firm charges a fee for stock and bond trades. Trisperity Advisors does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities,



investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, interests in partnerships, and initial public offerings (IPOs).

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### **Termination of Agreement**

A Client may terminate any of the aforementioned agreements at any time by notifying Trisperity Advisors in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, Trisperity Advisors will refund any unearned portion of the advance payment.

Trisperity Advisors may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, Trisperity Advisors will refund any unearned portion of the advance payment.

## **5. Fees and Compensation**

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### **Description**

Trisperity Advisors bases its fees on a percentage of assets under management, hourly charges, and fixed fees (not including subscription fees).

Some *Retainer Agreements* may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship. The annual fee for a Retainer Agreement is negotiable.

Financial plans are priced according to the degree of complexity associated with the client's situation.

Fees are negotiable.

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### **Fee Billing for Asset Management**

Investment management fees are billed quarterly, in advance, meaning that we determine the fee on the last day before the next three-month billing period has begun. Payment in full is expected upon determination of the fee. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

The typical quarterly Advisory Service Agreement maximum fee is based on a percentage of the investable assets according to the following schedule:

- 0.2500% on the first \$1,000,000;
- 0.1875% on the next \$2,000,000 (from 1,000,001 to 3,000,000); and
- 0.1250% on the assets above \$3,000,000.

There is no minimum annual fee. Client relationships may exist where the fees are lower or higher than the fee schedule above.

Client may make additions to or withdrawals from the investable assets at any time. Additions may be in cash or securities. If cash or securities are accepted for management during the quarter, a prorated asset-based fee using the value of asset additions will be charged from date of deposit to end of current quarter. Client may request periodic withdrawals and may withdraw investable assets. Conversely, a prorated asset-based fee using on the value of assets withdrawn will be credited back from date of withdrawal to end of current quarter.

All accounts for a client household portfolio will be aggregated for the fee calculation for purposes of achieving a reduced percentage fee. As the household portfolio value reaches various thresholds, the assets above each threshold may be charged successively lower percentages, and the total asset-based fee applied to each account is a blended rate based on the total household portfolio value.

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### **Fee Billing for Financial Planning**

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The fee can range from \$450 to address a single objective to \$2,000 for many integrated objectives with the range of \$550 to \$750 more typical. The fee is negotiable. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to one month.

The hourly rate for limited scope engagements and follow-on implementation is billed separately at the rate of \$150 to \$250 per hour.

Fees for financial plans are typically billed 50% in advance, with the balance due upon delivery of the financial plan.

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### **Other Fees**

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Trisperity Advisors, in its sole discretion, may charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of

assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

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### **Expense Ratios**

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to Trisperity Advisors.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

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### **Past Due Accounts and Termination of Agreement**

Trisperity Advisors reserves the right to stop work on any account that is more than 30 days overdue. In addition, Trisperity Advisors reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Trisperity Advisors judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

## **6. Performance-Based Fees**

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### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Trisperity Advisors does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

## **7. Types of Clients**

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### **Description**

Trisperity Advisors generally provides investment advice to individuals, banks or thrift institutions, investment companies, trusts, estates, or charitable organizations, or corporations or business entities.

Client relationships vary in scope and length of service.

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### **Account Minimums**

There are currently no minimum account size requirements.

## 8. Methods of Analysis, Investment Strategies and Risk of Loss

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### Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that Trisperity Advisors may use include Morningstar Office research information and the World Wide Web.

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### Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation, which involves assets from up to 6 different broad asset classes. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

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### Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## 9. Disciplinary Information

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### **Disciplinary**

The firm and its employees have not been involved in disciplinary events related to past or present investment clients.

## 10. Other Financial Industry Activities and Affiliations

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### **Financial Industry Activities**

Trisperity Advisors is NOT registered as a securities broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor.

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### **Affiliations**

Trisperity Advisors DOES NOT have any arrangements that are material to its advisory or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant,

banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

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

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### **Code of Ethics**

The employees of Trisperity Advisors have committed to a Code of Ethics as derived from rules and sections under the Investment Advisers Act of 1940 and the Certified Financial Planner Board of Standards as guidance in the performance of our professional services. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

The Code is based upon the principle that Trisperity and its employees owe a fiduciary duty to Trisperity's clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with Trisperity and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The Code is designed to ensure that the high ethical standards long maintained by Trisperity continue to be applied. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The excellent name and reputation of Trisperity continues to be a direct reflection of the conduct of each employee.

Other elements of the Code include:

Maintaining the confidentiality and protecting the privacy of client information.

Administering a trading and reporting policy that requires employees to disclose personal security holdings annually and personal security transactions quarterly. This policy also prohibits misuse of material, non-public information by its supervised persons, otherwise known as insider trading.

Avoiding potential conflicts of interest that may arise when an employee accepts or gives a gift, favor, entertainment, special accommodation or other items of value that is inconsistent with applicable laws or regulations.

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### **Participation or Interest in Client Transactions**

Trisperity Advisors and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades.

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**Personal Trading**

The Chief Compliance Officer of Trisperity Advisors is Craig Narum. He reviews all employee trades each quarter. His trades are not reviewed. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

## **12. Brokerage Practices**

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**Selecting Brokerage Firms**

Trisperity Advisors does not have any affiliation with investment product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. Trisperity Advisors recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

Trisperity Advisors recommends discount brokerage firms and trust companies (qualified custodians), such as TD Ameritrade Institutional.

Trisperity Advisors does not receive fees or commissions from any of these arrangements.

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**Best Execution**

Trisperity Advisors reviews the execution of trades at each custodian each quarter. Trading fees charged by the custodians is also reviewed on a quarterly basis. Trisperity Advisors does not receive any portion of the trading fees.

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**Soft Dollars**

Trisperity Advisors does not receive any soft dollar fees or credits from any custodian.

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**Mutual Fund Share Class Selections**

The Firm can buy and sell mutual funds for client accounts from a list of approved funds provided by the qualified custodian. The list of funds can include multiple share classes issued by the fund manager for the same fund. For each share class, the custodian indicates which buy or sell transactions will be subject to a transaction charge (e.g. \$24/trade) and which ones will not (called NTF or no transaction fee). The Firm only buys share classes that are transacted at the fund net asset value (NAV). For example, this can include institutional share classes or load-waived A share classes.

Each fund share class has a reported Annual Report Net Expense Ratio that the Firm accesses from the Morningstar database as provided by the fund manager.

The determination of which share class to buy is done on a trade-by-trade basis using consistent economic analysis for each client account. The objective is to use the lowest-cost share class that is available to the client when considering several factors, including: number of expected trade executions, expected holding period, custodian transactions fees and fund expense ratios.

Below is a “break-even” calculation example with one year expected holding period for a fund that has a share class with annual expense ratio of 0.50% and \$24/trade custodian transaction cost versus another share class with annual expense ratio of 0.75% but \$0/trade custodian transaction cost:

Break-even purchase value = (# buy & sell transactions x cost per trade) / (holding years x expense ratio difference)

Break-even purchase value = (2 trades x \$24 per trade) / (1 year x 0.25%) = \$19,200

In this example, if the trade value was higher than the break-even value, the Firm would use the share class with the \$24/trade transaction cost and lower fund expense ratio. Likewise, if the trade value was lower than the break-even value, the Firm would use the share class with the \$0/trade transaction cost and higher fund expense ratio.

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### **Order Aggregation**

When the Firm buys or sells a security for multiple accounts at the same time, standard practice is to implement these transactions on an aggregate or block trade basis. The main objective is to ensure that the allocations are done in a fair and equitable manner and that no client accounts are systematically disadvantaged. This includes all accounts, whether among client accounts or employee accounts traded alongside client accounts.

## **13. Review of Accounts**

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### **Periodic Reviews**

Account reviews are performed at least quarterly by advisor Craig Narum, Principal. Account reviews are performed more frequently when market conditions dictate.

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### **Review Triggers**

Other conditions that may trigger a review are changes in the tax laws, new investment information, client request, and changes in a client's own situation.



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**Regular Reports**

Account reviews consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive periodic communications on at least an annual basis. Advisory Service Agreement clients receive written quarterly updates. The written updates may include a portfolio statement and a summary of objectives and progress towards meeting those objectives.

## **14. Client Referrals and Other Compensation**

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**Incoming Referrals**

Trisperity Advisors has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

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**Referrals Out**

Trisperity Advisors does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

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**Other Compensation**

Not applicable.

## **15. Custody**

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**Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

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**Performance Reports**

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by Trisperity Advisors.

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**Net Worth Statements**

Clients are sometimes provided net worth statements and net worth graphs that are generated from our financial planning management system. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The

net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

## **16. Investment Discretion**

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### **Discretionary Authority for Trading**

Trisperity Advisors primarily uses discretionary authority to manage securities accounts on behalf of clients. In such instances, Trisperity Advisors has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client approves the custodian to be used along with the commission rates paid to the custodian. Trisperity Advisors does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

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### **Limited Power of Attorney**

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

## **17. Voting Client Securities**

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### **Proxy Votes**

Trisperity Advisors does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, Trisperity Advisors will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

## **18. Financial Information**

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### **Financial Condition**

Trisperity Advisors does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Trisperity Advisors does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$600 per client, and six months or more in advance.

# Business Continuity Plan

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## General

Trisperity Advisors has a Business Continuity Plan in place that provides steps to mitigate and recover from the loss of office space, communications, services or key people.

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## Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, internet outage, railway accident and aircraft accident. Electronic files are backed up continuously and archived offsite.

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## Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

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## Loss of Key Personnel

Trisperity Advisors has an active *Guardian Agreement* in place. This is an emergency plan that assures a seamless transfer of control and responsibility in the event of a sudden departure from the practice or business of Craig Narum, whether by choice or through termination of employment, death or disability.

Trisperity Advisors also has a standing *Death of an Advisor* guideline with TD Ameritrade to support Trisperity Advisors in the event of Craig Narum's serious disability or death.

# Information Security Program

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## Information Security

Trisperity Advisors maintains an information security program to reduce the risk that your personal and confidential information may be breached.

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## Privacy Notice

Trisperity Advisors is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

## Brochure Supplement (Part 2B of Form ADV)

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### **Education and Business Standards**

Trisperity Advisors requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, RP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

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### **Professional Certifications**

Employees have earned certifications and credentials that are required to be explained in further detail. Not all may be applicable to Trisperity employees.

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board ([www.cfp.net](http://www.cfp.net)).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Chartered Financial Analyst (CFA): Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
- Successful completion of all three exam levels of the CFA Program.
- Have 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

Enrolled Agent (EA): Enrolled Agents are enrolled by the Internal Revenue Service and authorized to use the EA designation. EA enrollment requirements:

- Successful completion of the three-part IRS Special Enrollment Examination (SEE), or completion of five years of employment by the IRS in a position which regularly interpreted and applied the tax code and its regulations.
- Successfully pass the background check conducted by the IRS.

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**Craig Narum, CFP®****Background and Education:**

- Date of birth: March 7, 1961
- BS, Chemical Engineering, University of Oklahoma, Norman, OK (1983).
- Passed the CFP® Certification Examination (July, 2001)

**Business Experience:**

- Principal/owner, Trisperity Advisors, LLC (present)
- Registered representative of Financial Network Investment Corporation (2001-2006)
- Adjunct senior consultant for Qittitut Consulting, LLC (2001-present)
- System Development Director, Landmark Graphics Corporation (2000-2001)
- Planning & Engineering, Mobil Oil Corporation (1984-2000)

**Disciplinary Information:** None

**Other Business Activities:** Occasionally provides business consulting services in the areas of growth strategy facilitation, business process redesign and financial modeling. Time spent on these activities varies from 0 to 2 working days per month and the commitment is completely at the discretion of Craig Narum as time permits.

**Additional Compensation:** None

**Arbitration Judgments:** None

**Self-Regulatory Organization or Administrative Proceeding:** None

**Bankruptcy Petition:** None

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**Jeffrey McCulloch, CFP®****Background and Education:**

- Date of birth: July 19, 1982
- BS, Personal Financial Planning, Texas Tech University, Lubbock, TX (2006).

**Business Experience:**

- Associate Advisor, Trisperity Advisors, LLC (present)
- Paraplanner/Financial Planning Associate, Tiras Wealth Management (2013-2017)
- Investment Associate, Investec Advisory Group (2007-2013)
- Senior Client Associate, AP Financial (2006-2007)

**Disciplinary Information:** None

**Other Business Activities:** Trustee for a private family trust. Time spent on these activities varies from 0 to 1 working days per month and the commitment is completely at the discretion of Jeff McCulloch as time permits.

**Additional Compensation:** None

**Arbitration Judgments:** None

**Self-Regulatory Organization or Administrative Proceeding:** None

**Bankruptcy Petition:** None

**Supervision:** Activities and client advice monitored by Craig Narum, Principal/owner of Trisperity Advisors (phone 281-395-1021)