



true wealth
DESIGN

True Wealth Design, LLC

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FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of True Wealth Design, LLC (the "Advisor"). If you have any questions about the contents of this brochure, please contact us at (330) 777-0688 or kkroskey@truewealthdesign.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 True Wealth Design, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

References herein to True Wealth Design, LLC as a "registered investment adviser" or any reference to being "registered" does not imply a certain level of skill or training.

Item 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our annual updating amendment dated March 8, 2021, we have the following material changes to report:

- We have amended Item 10 Other *Financial Industry Activities and Affiliations* to disclose that an associated person and investment adviser representative with our firm is affiliated through common control and ownership, and dually registered as an investment adviser representative with Seil Wealth Management, LLC. Please refer to Item 10 for additional information regarding our financial industry activities and affiliations.

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Item 4 Advisory Business

True Wealth Design, LLC (Advisor) was formed in February 2007 in the State of Ohio to provide financial planning services with a focus on retirement planning, tax planning, and investment management services for mid and high-net-worth clients. The Advisor is wholly-owned by Kevin Kroskey, the Advisor's Managing Partner.

The company is an IRS-Authorized, E-file Provider for tax preparation and tax filing services. Associated persons or executive officers of our firm may also be accounting and tax professionals and may also be separately licensed as a Certified Public Accountant or Enrolled Agent.

The company is also an Ohio licensed independent insurance brokerage agency providing limited insurance services as a convenience to clients in a fully-disclosed, fiduciary manner.

True Wealth Design offers the following services to its clients (individuals, business entities, trusts, estates, charitable organizations, and pension and profit-sharing plans):

FINANCIAL PLANNING SERVICES (STAND-ALONE)

True Wealth Design provides financial planning services. Financial planning can be a limited engagement to assess, review or make recommendations on a specific issue. Financial planning can also be a comprehensive evaluation process in which numerous strategic recommendations are given. These recommendations may be applicable to the client's current and/or assumed future financial state. Variables based on the client's situation as well as historical and current market conditions may be used to project estimates of future cash flows, asset values, and withdrawal strategies. Throughout the financial planning process, relevant client information and projections are considered.

In general, the financial planning services can address any of the following areas:

- **PERSONAL:** We review family records, budgeting, personal liability, estate information, and financial goals.
- **CASH FLOW and DEBT MANAGEMENT:** We analyze the client's current and future cash flow needs as well as debt management strategies.
- **RETIREMENT PLANNING:** After analyzing and modeling the client's cash flow needs, we then illustrate the possible impact of various retirement dates, retirement income claiming strategies (Social Security, Pensions), tax-smart distribution strategies, and investment decisions on the client's future ability to create and maintain the lifestyle defined by the cash flows.
- **INVESTMENTS:** We analyze the client's current investments to determine how they might align with the client's objectives. During this analysis, we review tax efficiency, fees and expenses, diversification, risk, and investment performance.
- **TAX PLANNING:** We review the client's current tax situation including income, investments, deductions, exemptions, Roth IRA conversions, and current tax law to identify opportunities for reducing current and future tax liabilities.
- **RISK MANAGEMENT and INSURANCE PLANNING:** We review potential risks to the client's financial well-being and then propose strategies to manage risks, including but not limited to self-insuring the risk. We analyze existing insurance policies to assess the recommended coverage for life, health, disability, long-term care, liability, home, and automobile.

- **ESTATE PLANNING:** We assist the client in assessing and developing long-term strategies, including as appropriate; living trusts, wills, estate tax strategies, powers of attorney, asset protection plans, nursing homes, and Medicaid.

We gather the required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, return objectives and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and we then prepare recommendations.

Prior to engaging the Advisor to provide planning or consulting services, clients are generally required to enter into a *Financial Planning and Consulting Agreement* with Advisor setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to Advisor commencing services.

If requested by the client, Advisor may recommend the services of other professionals for implementation purposes, including the Advisor's representatives in their individual capacities as licensed insurance agents. (See disclosure at Item 10.) The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the Advisor.

Please Note: If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

Please Also Note: It remains the client's responsibility to promptly notify the Advisor if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising the Advisor's previous recommendations and/or services.

Typically the financial plan and recommendations are presented to the client over one to three meetings within eight weeks of the contract date, provided that all information needed to prepare the financial plan has been promptly provided.

INVESTMENT ADVISORY SERVICES (STAND-ALONE)

For those individuals who do not wish to engage True Wealth Design for the Wealth Management Services (described below), True Wealth Design offers its Investment Advisory Services (IAS) platform. Under IAS, the client receives services limited to True Wealth Design's asset allocation and rebalancing of the client's assets typically among various mutual funds, interval funds, or ETF's consistent with the client's investment objectives.

For certain clients, we may recommend a direct-indexing stock investment strategy, True Wealth Smart Design Direct, or private pooled investments. (For additional information please refer to *Item 8 Methods of Analysis, Investment Strategies and Risk of Loss.*)

We can also manage several accounts of differing account tax structures within a single portfolio allocation model to create a tax profile designed to increase tax efficiency.

True Wealth Design remains available to provide Financial Planning Services (described above) on a fixed fee basis upon client request.

WEALTH MANAGEMENT SERVICES (FINANCIAL PLANNING + INVESTMENT ADVISORY)

True Wealth Design's "Wealth Management Service" bundles continuous Investment Advisory Services (described separately above) and may include Financial Planning Services (described separately above) to the extent specifically requested by the client. Additionally, tax preparation services and estate planning services, provided by a licensed attorney separate from True Wealth Design, are included as part of the annual fee for Wealth Management Services for certain clients at the exclusive discretion of True Wealth Design.

True Wealth Design has created two service models within Wealth Management Services:

- **True Wealth Planning:**
 - Generally, for individuals and families in retirement or seriously preparing for retirement and having up to \$750,000 in investable assets.
 - Focus tends to be more on cash flow, retirement planning, and investments.
 - A CERTIFIED FINANCIAL PLANNERTM professional and client service administrator will be assigned for your service team.
- **True Wealth Private Client:**
 - Generally, for individuals and families with \$750,000 or more in investable assets or those that tend to have increased complexity in their financial situation.
 - Any areas of financial planning may be addressed with greater emphasis on investments and tax planning.
 - A CERTIFIED FINANCIAL PLANNER[®] professional and client service administrator will be assigned for your service team.
 - Tax return preparation services
 - Estate planning services
 - For certain clients, we may recommend a direct-indexing stock investment strategy, True Wealth Smart Design Direct, or Private Investment Funds. (For additional information please refer to *Item 8 Methods of Analysis, Investment Strategies and Risk of Loss.*)

The service model is determined in the Advisor's sole discretion and may be based on certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, the dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.) In the event the client desires to fall under the True Wealth Private Client service model and this is not congruent with the Advisor's sole discretion in determining the appropriate service model, the Advisor may impose a higher minimum fee. (See Item 5.)

In the event that the client requires extraordinary planning and/or consultation services (to be determined in the sole discretion of the Advisor), the Advisor may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client, which the client can then accept or reject prior to extraordinary services being rendered.

RETIREMENT PLAN CONSULTING SERVICES

True Wealth Design also provides discretionary and/or non-discretionary pension consulting services, pursuant to which it assists sponsors of self-directed retirement plans with the selection and/or monitoring of investment alternatives (generally open-end mutual funds) from which plan participants shall choose in self-directing the investments for their individual plan retirement accounts. In addition, to the extent requested by the plan sponsor, the Advisor shall also provide participant education designed to assist participants in identifying the appropriate investment strategy for their retirement plan accounts. The terms and conditions of the engagement shall generally be set forth in a *Retirement Plan Consulting Agreement* between the Advisor and the plan sponsor.

MISCELLANEOUS

Non-Investment Consulting/Implementation Services: To the extent requested by the client, the Advisor *may* provide consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. Neither the Advisor, nor any of its representatives, serves as an attorney or accountant, and no portion of the Advisor's services should be construed as same. To the extent requested by a client, the Advisor may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance, etc.), including representatives of the Advisor in their separate registered/licensed capacities as discussed below in Item 10. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the Advisor.

Please Note: If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

Please Also Note: It remains the client's responsibility to promptly notify the Advisor if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising the Advisor's previous recommendations and/or services.

Non-Discretionary Service Limitations. Clients that determine to engage the Advisor on a non-discretionary investment advisory basis must be willing to accept that the Advisor cannot effect any account transactions without obtaining prior verbal consent to any such transaction(s) from the client. Thus, in the event of a market correction during which the client is unavailable, the Advisor will be unable to affect any account transactions (as it would for its discretionary clients) without first obtaining the client's verbal consent.

Fee Differentials. As indicated above, the Advisor shall price its services based upon various objective and subjective factors. As a result, Advisor's clients could pay diverse fees based upon the market value of their assets, the complexity of the engagement, and the level and scope of the overall investment advisory and/or consulting services to be rendered. As a result of these factors, the services to be provided by the Advisor to any particular client could be available from other advisers at lower fees. All clients and prospective clients should be guided accordingly.

Trade Error Policy. As a fiduciary, the Advisor has the responsibility to effect trade orders correctly, promptly and in the client's best interests. In the event we cause a trade or other error to occur in a client account and the error results in a loss, the Adviser's policy is that clients are made whole. Absent a contrary understanding or policy with the client's custodian, or if the client decides to forgo the gain (for example, due to tax reasons), any gain related to the error will generally remain in the client's

account. If related trade errors result in both gains and losses in a client's account, they are generally netted. Certain custodians maintain their own policies with regard to the handling of trade or other errors; in such cases, the Advisor will work with the custodian to ensure the client is made whole.

Client Obligations. In performing its services, Advisor shall not be required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify the Advisor if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising the Advisor's previous recommendations and/or services.

Disclosure Statement. A copy of the Advisor's written Brochure as set forth on Part 2A of Form ADV shall be provided to each client prior to, or contemporaneously with, the execution of any written agreement. Any client who has not received a copy of the Advisor's written Brochure at least 48 hours prior to executing the agreement shall have five business days subsequent to executing the agreement to terminate the Advisor's services without penalty.

The Advisor shall provide investment advisory services specific to the needs of each client. Prior to providing investment advisory services, an investment adviser representative will discuss with each client, their particular investment objective(s). The Advisor shall allocate each client's investment assets consistent with their designated investment objective(s). Clients may, at any time, impose restrictions, in writing, on the Advisor's services.

The Advisor does not participate in a wrap fee program.

Assets Under Management

As of March 3, 2021, we provide continuous management services for \$341,703,339 in client assets on a discretionary basis and \$0 in client assets on a non-discretionary basis.

Item 5 Fees and Compensation

True Wealth Design charges fees for advisory services such as financial planning and asset management. Financial Planning Service engagements are limited in nature and fees are calculated on a fixed-fee or hourly basis and quoted in advance. Continuous investment advisory services and wealth management services may be provided, and the Advisor shall deduct fees and/or bill clients quarterly in advance, based upon the market value of the assets on the last business day of the previous quarter. When the client is a 401k plan, the Advisor shall deduct fees and/or bill quarterly in arrears.

Additional details of these fee arrangements follow:

FINANCIAL PLANNING SERVICES (STAND-ALONE)

Financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) are provided on a stand-alone fee basis. Advisor's planning and consulting fees are negotiable, but generally range from a \$250 to \$10,000 on a fixed-fee basis and \$250 to \$750 on an hourly rate basis, depending upon the level and scope of the service(s) required and the professional(s) rendering the service(s).

Prior to engaging the Advisor to provide planning or consulting services, clients are generally required to enter into a *Financial Planning and Consulting Agreement* with Advisor setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be

provided, and the portion of the fee that is due from the client prior to Advisor commencing services. Refunds of prepaid fees will be made to the client in the event of termination in accordance with the agreement, provided that any unused portion of the prepaid fee remains.

INVESTMENT ADVISORY SERVICES (STAND-ALONE)

The annual fee for Investment Advisory Services (IAS) shall vary (from 0.25% up to 1.60% of the total assets placed under the Advisor's (management/advisement). This annual fee shall be prorated and paid quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. The Advisor generally requires a minimum annual fee of \$1,800 (\$450 per quarter) per household. We generally recommend a minimum portfolio size of \$100,000 for this service. The Advisor, in its sole discretion, may charge a lesser investment management fee and/or reduce or waive its annual/quarterly minimum fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, the dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.). The annual fee will be based upon various objective and subjective factors, including, but not limited to, the amount of the assets placed under the Advisor's direct management, the amount of the assets placed under the Advisor's advisement (assets that are generally managed directly by the client or by other investment professionals engaged by the client) for which the Advisor provides review/monitoring services, but does not have trading authority, the complexity of the engagement, and the level and scope of the overall investment advisory services to be rendered. See *also* Fee Differential discussion above.

Prior to engaging the Advisor to provide planning or consulting services, clients are generally required to enter into an *Investment Advisory Agreement* with Advisor setting forth the terms and conditions of the engagement (including termination). The client can determine to engage the Advisor to provide discretionary and/or non-discretionary investment advisory services on a *fee* basis.

WEALTH MANAGEMENT SERVICES (FINANCIAL PLANNING + INVESTMENT ADVISORY)

The Advisor's annual fee shall vary (from 0.25% up to 1.60% of the total assets placed under the Advisor's management/advisement). This annual fee shall be prorated and paid quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. The Advisor generally requires a minimum annual fee of \$4,200 (\$1,050 per quarter) per household for this service.

An initial deposit of \$2,100 (\$1,050 minimum for two quarters) is generally required for services over the first two quarters. The date of the agreement marks the first quarter. There will be no proration for starting after the first day of the quarter or terminating prior to the last day of the second quarter. If the fee over the first two quarters is greater than the \$2,100 deposit, the deposit will be refunded. If not refunded, the deposit shall be considered earned by the Advisor for services rendered.

In the event the client desires to fall under the Integrated Wealth Management service model and this is not congruent with the Advisor's sole discretion in determining the appropriate service model (as described in Item 4), the Advisor may impose a higher minimum fee, generally of \$10,000 (\$2,500 per quarter) or more per household.

In the Advisor's sole discretion, we may charge a lesser investment management fee and/or reduce or waive its annual/quarterly minimum fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, the dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.). The annual fee will be based upon various objective and subjective factors, including, but not limited to, the amount of the assets placed under the Advisor's direct management, the amount of the assets placed under the Advisor's

advisement (assets that are generally managed directly by the client or by other investment professionals engaged by the client) for which the Advisor provides review/monitoring services, but does not have trading authority, the complexity of the engagement, and the level and scope of the overall investment advisory services to be rendered. See also Fee Differential discussion above.

Prior to engaging the Advisor to provide planning or consulting services, clients are generally required to enter into an *Investment Advisory Agreement* with Advisor setting forth the terms and conditions of the engagement (including termination). The client can determine to engage the Advisor to provide discretionary and/or non-discretionary investment advisory services on a *fee* basis.

At the exclusive discretion of True Wealth Design, tax return preparation services may be included for certain clients, generally those with a minimum of \$750,000 under the advisor's management, as part of their annual fee for Wealth Management Services.

At the exclusive discretion of True Wealth Design, estate planning services, provided by a licensed attorney separate from True Wealth Design, may be included for certain clients, generally those with a minimum of \$750,000 under the advisor's management, as part of their annual fee for Wealth Management Services.

In the event that the client requires extraordinary planning and/or consultation services (to be determined in the sole discretion of the Advisor), the Advisor may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client, which the client can then accept or reject prior to extraordinary services being rendered.

RETIREMENT PLAN CONSULTING SERVICES

The Advisor provides discretionary and/or non-discretionary pension consulting services, pursuant to which it assists sponsors of self-directed retirement plans with the selection and/or monitoring of investment alternatives (generally open-end mutual funds) from which plan participants shall choose in self-directing the investments for their individual plan retirement accounts. In addition, to the extent requested by the plan sponsor, the Advisor shall also provide participant education designed to assist participants in identifying the appropriate investment strategy for their retirement plan accounts. The terms and conditions of the engagement shall generally be set forth in a *Retirement Plan Consulting Agreement* between the Advisor and the plan sponsor. Generally, the Advisor charges an up-front flat fee equal to 1.00% of the retirement plan's assets, or a minimum fee of \$1,000, for initial plan consulting services. The Advisor's fee for continued retirement plan consulting services is negotiable.

OTHER INFORMATION

Fee Payment: Clients may elect to have the Advisor's advisory fees deducted from their custodial account. Both Advisor's *Investment Advisory Agreement* and the custodial/ clearing agreement may authorize the custodian to debit the account for the amount of the Advisor's investment advisory fee and to directly remit that management fee to the Advisor in compliance with regulatory procedures. In the limited event that the Advisor bills the client directly, payment is due upon receipt of the Advisor's invoice.

Custodian & Brokerage Fees: As discussed below, unless the client directs otherwise or an individual client's circumstances require, the Advisor shall generally recommend that Shareholders Service Group ("SSG"), TDA Ameritrade Institutional (TD Ameritrade), or Charles Schwab (Schwab) serve as the broker-dealer/custodian for client investment management assets. Broker-dealers charge brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual

equity and fixed income securities transactions). From time to time, small portions of positions will be sold to bring the cash account balance to the level required for automatic deduction of fees. It is understood that the payment of these fees will reduce the total investment return. In no instance does True Wealth Design, nor its representatives accept compensation from the sale of securities or other investment products.

Mutual Fund Fees: In addition to Advisor's investment management fee, brokerage commissions and/or transaction fees, clients will also incur, relative to all mutual fund and exchange-traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). Some funds also offer "I" or "Institutional, Advisor" classes of shares that are not usually available to the general public. These types of shares offer clients internal costs reduced from those of "public" shares. When deemed cost-effective, True Wealth Design strives to purchase these lower-cost shares, if they are available and comparable to "public" shares. In no instance does True Wealth Design receive any portion of mutual fund fees, costs, or any "soft-dollar" benefits from any mutual fund.

Limited Prepayment of Fees: Advance payments will never exceed \$1,200 for work that will not be completed within six months.

Termination: The *Investment Advisory Agreement* between the Advisor and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the *Investment Advisory Agreement*. Upon termination, the Advisor shall refund the pro-rated portion of the advanced advisory fee paid based upon the number of days remaining in the billing quarter.

IRA Rollover Considerations

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset-based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of:

1. Leaving the funds in your employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage, here are a few points to consider before you do so:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.

- a. Employer retirement plans generally have a more limited investment menu than IRAs.
 - b. Employer retirement plans may have unique investment options not available to the public such as employer securities or previously closed funds.
2. Your current plan may have lower fees than our fees.
 - a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
 - b. You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
3. Our strategy may have a higher risk than the option(s) provided to you in your plan.
4. Your current plan may also offer some form of financial advice.
5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution.
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
 - a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed at any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.

Item 6 Performance-Based Fees and Side-by-Side Management

Neither the Advisor nor any supervised person of the Advisor accept performance-based fees.

Item 7 Types of Clients

True Wealth Design provides services to individuals, business entities, trusts, estates, charitable organizations, and pension and profit-sharing plans. TWD does not have a minimum asset requirement to become a client but may impose minimum fees as described above.

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

True Wealth Design uses a structured process of constructing asset-allocation-based portfolios and then selecting investments to fulfill the asset allocation targets. Several methods of analysis, as well as research produced by other firms and academics, may be used. Some of these methods include modern portfolio theory, asset pricing theory, valuation methodologies, expected return forecasts, asset correlation, market technicals, and other science-based financial research.

True Wealth Design utilizes several strategies in an effort to affect the net investment results of our portfolios. We use strategies that are designed to diversify investment risk, manage portfolio volatility, manage performance risk over time, manage erosion from taxes, manage erosion from expenses and manage sustainable income distributions. We continually evaluate our investment strategies against current research data available and work to improve our portfolios and financial strategies.

We generally use the following strategies:

- ASSET ALLOCATION STRATEGY. Asset allocation is constructing portfolios with different asset classes that have a history of differing and partially offsetting volatility patterns. We use portfolios that spread investment risk over multiple asset classes. We utilize classes such as domestic equities, international equities, domestic fixed income, international fixed income, and several alternative asset classes as well as sub-sets of these broad asset classes. If the asset classes are well combined, the overall portfolio volatility may be reduced relative to the expected return, increasing portfolio efficiency.
- ASSET CLASS DIVERSIFICATION. We choose to broadly diversify each asset class in our portfolios across the broad market represented by the asset class while placing greater emphasis on science-based dimensions of higher expected returns. In special circumstances, individual stock or fund holdings with large, unrealized capital gains may be incorporated into the client's asset allocation and used as a substitute for a preferred holding.
- TOLERANCE-BASED REBALANCING. All individual portfolio assets are checked against allocation models on a daily basis. If an individual asset within a portfolio is out of tolerance, the asset is manually reviewed for an opportunity to rebalance the portfolio. This daily attention aims to capitalize on market volatility and realize a rebalancing bonus to client accounts while controlling for risk.
- ASSET LOCATION STRATEGY. To manage the net after-tax total return over time, we can unify multiple accounts of differing tax structures and manage them under one portfolio model. By matching the individual asset tax characteristics with a complimentary account type from a tax perspective, net after-tax returns may be improved. As a simplified example; if the portfolio model is 50% bonds and 50% stocks, then the bonds may be placed in an IRA because the bond interest is taxed as ordinary income and IRA distributions are also taxed as ordinary income. The stocks may be placed in a taxable or trust account because long-term stock gains or qualified dividends may be taxed at lower long-term capital gain tax rates when in a taxable account. If the stocks were placed in the IRA, then the long-term stock gains and qualified dividends would be taxed at typically higher ordinary income tax rates. We have created an asset-ranked, tax-grouping system to direct assets to an appropriate tax structure and to rebalance the overall portfolio model across multiple tax structures.
- INSTITUTIONAL CLASS INVESTMENTS. In an effort to control investment expenses and fees, we look for and use lower-cost institutional solutions, compared to retail solutions, whenever we identify institutional investment strategies appropriate for our portfolios.
- DIRECT STOCK STRATEGY (SMART DESIGN DIRECT). True Wealth's "Smart Design Direct" stock strategy applies similar principles utilized in institutional class investments we choose but without the management fee of the fund company. We adhere to our core asset allocation and asset class diversification strategies while benefiting from reduced management fees, fractional share trading, low or no commissions, tax-loss harvesting, and tax-loss carryforward. In an effort to achieve these benefits, TWD builds stock portfolios for clients without paying a third-party money manager to select stocks and maintain allocations.

True Wealth Design primarily allocates client investment assets among mutual funds, exchange-traded funds, or interval funds but may also use various individual equity and fixed income securities, and structured notes on a discretionary and non-discretionary basis in accordance with the client's designated investment objective(s). Private pooled investments such as real estate funds and private equity funds (collectively, "Private Investment Funds") may also be utilized. TWD primarily invests for relatively long time horizons, normally for a year or more. However, market developments could cause TWD to sell securities more quickly.

After the asset allocation policy is established, security analysis is conducted to assist with the investment selection process to fulfill the asset allocation. Analysis varies depending on the security in question.

- For mutual funds, interval funds, and ETFs the analysis generally includes a review of:
 - The fund's management team
 - The fund's historical risk and return characteristics
 - The fund's exposure to sectors and individual issuers
 - The fund's fee structure
 - The fund's management style
 - The fund's investment philosophy
 - The fund's total assets under management
 - The fund's style consistency
 - The fund's risk-adjusted performance relative to peers
 - The fund's liquidity and liquidity of underlying fund assets
 - The fund's regulatory oversight
 - Any other factors considered relevant.
- For stocks and bonds the analysis generally includes a review of:
 - Valuation
 - Profitability
 - Risk (beta and standard deviation)
 - Assets and liabilities as well as material changes
 - Dividends and buybacks vs. equity and debt issuance
 - Momentum
 - Analysts' consensus price targets
 - Bankruptcy risk
 - Earnings manipulation risk
 - Trading liquidity
 - Size (market capitalization and revenues)
 - Any other factors considered relevant
- For bonds the analysis generally includes a review of:
 - Credit quality
 - Price
 - Yield
 - Maturity
 - Duration
 - Inflation
 - Callability
 - Any other factors considered relevant

Please Note: Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by the Advisor) will be profitable or equal any specific performance level(s). The Advisor's methods of analysis and investment strategies do not present any unusual risks. However, every method of analysis has its own inherent risks. To perform an accurate market analysis the Advisor must have access to current/new market information. The Advisor has no control over the dissemination rate of market information; therefore, unbeknownst to the Advisor, certain analyses may be compiled with outdated market information, severely limiting the value of the Advisor's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Please Note: Interval Funds are registered under the Investment Company Act of 1940, as amended, which regulates mutual funds. Interval Funds, however, have limited liquidity, generally via quarterly offers to repurchase between 5% and 25% of its outstanding Common Shares at net asset value. Thus, Interval Funds may have extended periods of time before a position can be fully redeemed and Interval Funds may not be permitted to be transferred to non-advisory retail accounts.

Please Note: Private Investment Funds are not registered under the Investment Company Act of 1940, as amended, which regulates mutual funds. Accordingly, activities of Private Investment Funds are subject to less regulation and supervision than a registered investment company (i.e., a mutual fund). On a non-discretionary basis, True Wealth Design recommends that certain qualified clients consider allocating a portion of their investment assets to such Private Investment Funds. The terms and conditions for participation in Private Investment Funds, including management fees, conflicts of interest, and risk factors are detailed in the offering documents. Clients are under absolutely no obligation to consider or invest in Private Investment Funds. Private Investment Funds generally involve various risk factors, including, but not limited to, potential for complete loss of principal, liquidity constraints, and lack of transparency. These risk factors are detailed in each investment's offering documents, which are provided to each prospective investor for review and consideration. Unlike other liquid investments that a client typically maintains, Private Investment Funds do not provide daily liquidity or pricing. Each prospective client investor would be required to complete a Subscription Agreement. Afterward, the client would have to establish that he or she is qualified for investment and acknowledge and accept the various risk factors that are associated with such an investment.

Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. Our firm and our management personnel have no reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Neither the Advisor, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither the Advisor, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

Licensed Insurance Company. True Wealth Design, LLC is also a licensed independent insurance brokerage agency. The insurance fees and services are separate and distinct from the advisory fees and services provided by the company.

Licensed Insurance Agents. Certain of the Advisor's representatives are licensed insurance agents and may recommend the purchase of certain insurance-related products on a commission basis. Full disclosure of any first-year commissions received, which generally represent the majority of commission proceeds, will be made available at the client's written request to maintain transparency.

Accountant or Accounting Firm

True Wealth Design, LLC is also an IRS-Authorized, E-file Provider for tax preparation and tax filing services. Associated persons or executive officers of our firm may also be accounting and tax professionals and may also be separately licensed as a Certified Public Accountant or Enrolled Agent. Our advisory services are separate and distinct from the compensation paid for accounting or tax services.

Conflict of Interest: The recommendation by the Advisor's representatives that a client purchase an insurance product presents a conflict of interest, as the receipt of commissions through our firm may provide an incentive to recommend insurance products based on commissions received, rather than on a particular client's need. However, this conflict DOES NOT exclude True Wealth Design from having a duty at all times to act in the client's best interest. Full disclosure of any first-year commissions received, which generally represent the majority of commission proceeds, will also be made available at the client's written request to maintain transparency. No client is under any obligation to purchase any commission products from Advisor's representatives. Clients are reminded that they may purchase insurance products recommended by Advisor through other, non-affiliated insurance agents.

The Advisor does not recommend or select other investment advisors for its clients.

Dually Registered Investment Adviser Representatives

An associated person and investment adviser representative with our firm, Aaron W. Seil, is affiliated through common control and ownership, and dually registered as an investment adviser representative with Seil Wealth Management, LLC. Our advisory services are separate and distinct from the fees paid to our affiliate for their services. At this time, we are not referring clients to Seil and therefore no conflict exists.

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

The Advisor maintains an investment policy relative to personal securities transactions. This investment policy is part of the Advisor's overall Code of Ethics, which serves to establish a standard of business conduct for all of the Advisor's Representatives that is based upon fundamental principles of openness, integrity, honesty, and trust. A copy of the Code of Ethics is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, the Advisor also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the Advisor or any person associates with the advisor.

Neither the Advisor nor any related person of Advisor recommends, buys, or sells for client accounts, securities in which the Advisor or any related person of Advisor has a material financial interest.

The Advisor and/or representatives of the Advisor *may* buy or sell securities that are also recommended to clients. This practice may create a situation where the Advisor and/or representatives of the Advisor are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if the Advisor did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of the Advisor's clients) and other potentially abusive practices.

The Advisor has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of the Advisor's "Access Persons". The Advisor's securities truncation policy requires that Access Persons of the Advisor must provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Advisor selects; provided, however, that at any time that the Advisor has only one Access Person, he or she shall not be required to submit any securities report described above.

The Advisor and/or representatives of the Advisor *may* buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where the Advisor and/or representatives of the Advisor are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11, the Advisor has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of the Advisor's Access Persons.

Item 12 Brokerage Practices

In the event that the client requests that the Advisor recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct the Advisor to use a specific broker-dealer/custodian), Advisor generally recommends that investment management accounts be maintained at Shareholders Service Group (SSG), TD Ameritrade Institutional (TD Ameritrade), or Charles Schwab (Schwab). Prior to engaging the Advisor to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement* with Advisor setting forth the terms and conditions under which Advisor shall manage the client's assets and a separate custodial/clearing agreement with each designated broker-dealer/custodian. We are not affiliated with the custodian and/or broker-dealer we recommend. The custodian or broker-dealer we recommend does not supervise our firm, its agents or activities.

Factors that the Advisor considers in recommending any other broker-dealer/custodian to clients include the historical relationship with the Advisor, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by Advisor's clients shall comply with the Advisor's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where the Advisor determines, in good faith, that the commission/transaction fee is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Advisor will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees

charged by the designated broker-dealer/custodian are exclusive of, and in addition to, Advisor's investment management fee. The Advisor's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

To the extent that the Advisor provides investment management services to its clients, the transactions for each client account generally will be effected independently unless the Advisor decides to purchase or sell the same securities for several clients at approximately the same time. The Advisor may (but is not obligated to) combine or "block trade" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Advisor's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. The Advisor shall not receive any additional compensation or remuneration as a result of such aggregation. Block trades do not apply to mutual funds or interval funds that receive end-of-day pricing.

Research and Additional Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Advisor may receive from *SSG, TD Ameritrade, or Schwab* (or another broker-dealer/custodian) without cost (and/or at a discount) support services and/or products, certain of which assist the Advisor to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by the Advisor may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by Advisor in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that *may* be received may assist the Advisor in managing and administering client accounts. Others do not directly provide such assistance, but rather assist the Advisor to manage and further develop its business enterprise. Advisor's clients do not pay more for investment transactions effected and/or assets maintained at *SSG, TD Ameritrade, or Schwab* as a result of this arrangement. There is no corresponding commitment made by the Advisor to *SSG, TD Ameritrade, or Schwab* or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

TWD does not engage in directed brokerage arrangements.

TWD participates in the TD Ameritrade AdvisorDirect Program for advisers ("AdvisorDirect"). Disclosures on AdvisorDirect are more fully discussed in *Item 14 Client Referrals and Other Compensation*.

Item 13 Review of Accounts

For those clients to whom Advisor provides investment supervisory services, account reviews are conducted on an ongoing basis by the Advisor's Principals and Chief Compliance Officer. All investment advisory clients are advised that it remains their responsibility to advise the Advisor of any changes in their investment objectives and/or financial situation. All clients (in person, by telephone or via web) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with the Advisor on an annual basis.

The Advisor *may* conduct account reviews on other than a periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.

Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. The Advisor may also provide a written periodic report summarizing account activity and performance although information contained in these reports is available on demand through the True Wealth Client Portal.

Item 14 Client Referrals and Other Compensation

As referenced in Item 12 above, the Advisor may receive an indirect economic benefit from SSG, TD Ameritrade, or Schwab. The Advisor, without cost (or at a discount), may receive support services and/or products from SSG, TD Ameritrade, or Schwab.

Advisor's clients do not pay more for investment transactions effected and/or assets maintained at SSG, TD Ameritrade, or Schwab as a result of this arrangement. There is no corresponding commitment made by the Advisor to SSG, TD Ameritrade, or Schwab or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

If a client is introduced to the Advisor by either an unaffiliated or an affiliated solicitor, Advisor *may* pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Any such referral fee shall be paid solely from the Advisor's investment management fee, and shall not result in any additional charge to the client. If the client is introduced to the Advisor by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of his/her/its solicitor relationship and shall provide each prospective client with a copy of the Advisor's written Brochure with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between the Advisor and the solicitor, including the compensation to be received by the solicitor from the Advisor.

TD Ameritrade AdvisorDirect

We may receive client referrals from TD Ameritrade through our participation in TD Ameritrade AdvisorDirect (the "Advisor Direct" or "referral program"). In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, we may have been selected to participate in AdvisorDirect based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of, and unaffiliated with our firm; we do not have an employee or agency relationship between them. TD Ameritrade has established the referral program as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisers. TD Ameritrade does not supervise our firm and has no

responsibility for our management of your portfolios or our other advice or services. We pay TD Ameritrade an on-going fee for each successful client referral. This fee is usually a percentage (not to exceed 25%) of the advisory fee that you pay to our firm ("Solicitation Fee"). We will also pay TD Ameritrade the Solicitation Fee on any advisory fees received by our firm from any of a referred client's family members, including a spouse, child or any other immediate family member who resides with the referred client and who hire our firm on the recommendation of such referred client. We will not charge clients referred through AdvisorDirect any fees or costs higher than our standard fee schedule offered to our clients or otherwise pass Solicitation Fees paid to TD Ameritrade to you. For information regarding additional or other fees paid directly or indirectly to TD Ameritrade, refer to the TD Ameritrade AdvisorDirect Disclosure and Acknowledgment Form.

Our participation in AdvisorDirect raises potential conflicts of interest. TD Ameritrade will most likely refer clients through AdvisorDirect to investment advisers that encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to obtain client referrals from TD Ameritrade, we may have an incentive to recommend to our clients that their assets under management with our firm be held in custody with TD Ameritrade and to place transactions for their accounts with TD Ameritrade. In addition, we have agreed not to solicit clients referred to us through AdvisorDirect to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians, except when our fiduciary duties require us to do so. Our participation in AdvisorDirect does not diminish our duty to seek best execution of trades for client accounts.

The Advisor's Chief Compliance Officer, Kevin Kroskey, remains available to address any questions that a client or prospective client may have regarding the above arrangements.

Item 15 Custody

The Advisor shall have the ability to have its advisory fee for each client debited by the custodian on a quarterly basis. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. The Advisor may also provide a written periodic report summarizing account activity and performance. We are not affiliated with the custodian. The custodian does not supervise our firm, its agents or activities.

Please Note: To the extent that the Advisor provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by the Advisor with the account statements received from the account custodian.

Please Also Note: The account custodian does not verify the accuracy of the Advisor's advisory fee calculation.

Item 16 Investment Discretion

The client can determine to engage the Advisor to provide investment advisory services on a discretionary basis. Prior to the Advisor assuming discretionary authority over a client's account, the client shall be required to execute *Investment Advisory Agreement*, naming the Advisor as client's attorney and agent-in-fact, granting the Advisor full authority to buy, sell, or otherwise affect investment transactions involving the assets in the client's name found in the discretionary account. In all cases, however, this discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account(s).

Clients who engage the Advisor on a discretionary basis may, at any time, impose restrictions, in writing, on the Advisor's discretionary authority. (i.e., limit the types/amounts of particular securities purchased for their account, limit or proscribe the Advisor's use of margin, etc.).

Private Investment Funds

On a non-discretionary basis, True Wealth Design recommends that certain qualified clients consider allocating a portion of their investment assets to such Private Investment Funds. Each prospective client investor would be required to complete a Subscription Agreement. Afterward, the client would have to establish that he or she is qualified for investment and acknowledge and accept the various risk factors that are associated with such an investment.

Item 17 Voting Client Securities

The Advisor does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, bankruptcy proceedings or other type events pertaining to the client's investment assets.

The Advisor will manage tender offers for interval funds utilized within the True Wealth model portfolios.

Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact the Advisor to discuss any questions they may have with a particular solicitation.

Item 18 Financial Information

The Advisor does not solicit fees of more than \$1,200 per client paid six months or more in advance.

The Advisor is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.

The Advisor has not been the subject of a bankruptcy petition.

Item 19 Requirements for State-Registered Advisers

We are a federally registered investment adviser; therefore, we are not required to respond to this item.