



Resolute Financial, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: March 2, 2021

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Resolute Financial, LLC (“Resolute” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at 978-463-8771 or by email at info@resolutefinancial.com.

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

Additional information about Resolute and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD# 125739.

Item 2 – Material Changes

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

Resolute believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Resolute encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor has amended its advisory fees. Please see Item 5 for additional information.

Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 125739. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at 978-463-8771 or by email at info@resolutefinancial.com.

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Item 4 – Advisory Services

A. Firm Information

Resolute Financial, LLC (“Resolute” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the Commonwealth of Massachusetts. Resolute was founded in May 2003 and is owned and operated by Charles M. Johnson (Chief Compliance Officer), Robert T. Ryan (Chief Investment Officer), William Simpson (Managing Partner), and Thomas G. Dwyer (Chief Financial Officer). Resolute is a fee-only Advisor, registered as a corporate member of NAPFA (National Association of Personal Financial Advisors). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Resolute.

B. Advisory Services Offered

Resolute offers investment advisory services to individuals, high net worth individuals, trusts, estates, and other investment advisors (each referred to as a “Client”).

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

Financial Services

The Advisor offers investment management and financial planning services as a combined service (“financial services”).

Investment Management Services - Resolute provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and consulting services. Resolute works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Resolute will then construct an investment portfolio, consisting of diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds, commodities, certificate deposits (CDs), short sales, margins, options, frequent trades, and/or independent managers to meet the needs of its Clients. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Resolute’s investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Resolute will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Resolute evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Resolute may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Resolute may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. Resolute may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will Resolute accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the financial services agreement, please see Item 12 – Brokerage Practices.

Use of Independent Managers – When deemed to be in the Client’s best interest, Resolute may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portion of a Client’s investment portfolio. In such instances, the Client will be required to

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

Financial Planning Service - The Advisor offers financial planning services as an individual service for certain legacy Clients, and for collaborative divorce cases through a qualified divorce attorney, pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives.

Generally, such financial planning services will involve preparing a financial plan based on the Client's financial goals and objectives. This planning may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, insurance needs, education savings and other areas of a Client's financial situation.

A financial plan developed for the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Resolute may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For ad-hoc engagements, the Advisor may not provide a written summary. Plans are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Recommendations made for financial planning services pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services, as it will increase the amount of advisory fees paid to the Advisor in the event that the Client agrees to the additional services. Financial services Clients generally will not face higher fees when account balances increase, because the Advisor charges a flat fee. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction[s] through the Advisor.

C. Client Account Management

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

- Establishing Investment Strategy – Resolute, in connection with the Client, will develop a strategy that seeks to achieve the Client's investment goals and objectives.
- Asset Allocation – Resolute will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Resolute will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Resolute will provide investment management and ongoing oversight of the Client's investment portfolio.

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D. Wrap Fee Programs

Resolute does not manage or place Client assets into a wrap fee program. Financial services are provided directly by Resolute.

E. Assets Under Management

As of December 31, 2020, manages \$374,749,091 in Client assets, \$329,225,483 of which are managed on a discretionary basis and \$45,523,608 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements that detail the responsibilities of Resolute and the Client.

A. Fees for Advisory Services

Financial Services

Financial services fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the financial services agreement. Clients will be charged a flat fee starting at the beginning of each quarter, based on the date of the executed agreement.

Financial services fees range from \$700 to \$4,000 per quarter (\$2,800 to \$36,000 annually) depending on the complexity of the engagement, financial planning needs, frequency of reviews and meetings, and size of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee. Fees may be negotiable at the sole discretion of the Advisor. Financial services fees in the first quarter of service will commence the month following the inception date of the agreement.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Use of Independent Managers

As noted in Item 4, the Advisor will implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described above. Independent Managers typically do not offer any fee discounts but may have a breakpoint schedule which will reduce the fee with an increased level of assets placed under management with an Independent Manager. The terms of such fee arrangements are included in the Independent Manager's disclosure brochure and applicable contract[s] with the Independent Manager. The total blended fee, including the Advisor's fee and the Independent Manager's fee, will not exceed 2.00% annually.

Financial Planning Services

The Advisor only offers financial planning services as a stand-alone service for certain legacy Clients, and for collaborative divorce cases through a qualified divorce attorney. Financial planning services are offered on an hourly basis at a rate of \$250 per hour, which may be negotiable depending on the nature and complexity of each Client's circumstance. An estimate of total hours and overall costs will be determined prior to establishing a financial planning agreement between the Advisor and the Client.

B. Fee Billing

Financial Services

Financial services fees will be automatically deducted from the Client account[s] at the Custodian. The Advisor or its delegate shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client account[s] at the start of the respective quarter. The amount due is the flat fee as agreed upon in the financial services agreement. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the financial services fee. It is the responsibility of the Client and Advisor to verify the accuracy of these fees as listed on

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the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Resolute directly from their account[s] held by the Custodian as part of the financial services agreement and separate account forms provided by the Custodian.

Use of Independent Managers

For Clients referred by the Advisor to an Independent Manager, the Client's fee will be separately deducted from the Client's account[s] by the Independent Manager.

Financial Planning Services

Fees for financial planning services are invoiced by the Advisor and are due upon completion of the agreed upon deliverable[s].

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Resolute, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all securities execution and custody fees charged by the Custodian, if applicable. The Advisor's recommended Custodians do not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodians typically charge for mutual funds and other types of investments. The financial services fee charged by Resolute is separate and distinct from these custody and execution fees.

In addition, all fees paid to Resolute for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Resolute, but would not receive the services provided by Resolute which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Resolute to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Financial Services

Resolute is compensated for its services in advance of the quarter in which financial services are rendered. Financial services are offered as a perpetual engagement. Agreements shall be perpetual in nature and will continue indefinitely, unless terminated by either the Advisor or the Client. Clients may also request to terminate their financial services agreement with Resolute, in whole or in part, by providing thirty (30) days advance written notice. The Advisor may terminate the financial services agreement at any time by providing advance written notice. The Client shall be responsible for financial services fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid financial planning fees from the effective date of termination to the end of the quarter. The Client's financial services agreement with the Advisor is non-transferable without the Client's prior consent.

Use of Independent Managers

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

Financial Planning Services

Resolute is compensated for its services upon completion of the engagement deliverable[s]. Either party may terminate the financial planning agreement at any time by providing written notice to the other party. The Client may also terminate the agreement within five (5) days of signing the Advisor's financial planning agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

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E. Compensation for Sales of Securities

Resolute does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the financial services fees noted above.

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

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

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

Item 7 – Types of Clients

Resolute provides investment advisory services to individuals, high net worth individuals, trusts, estates, and other investment advisors. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. These percentages will change over time. Resolute generally does not impose a minimum relationship size.

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

A. Methods of Analysis

Resolute primarily employs fundamental analysis in developing investment strategies for its Clients. Research and analysis from Resolute are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, Resolute generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Resolute will typically hold all or a portion of a security for more than a year but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Resolute may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Resolute will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

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

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The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later. There is also a risk that Authorized Participants are unable to fulfill their responsibilities. Authorized Participants are one of the major parties involved with ETF creation/redemption mechanism in the markets. The Authorized Participants play a critical role in the liquidity of ETFs and essentially have the exclusive right to change the supply of ETF shares in the market. If the Authorized Participants does not fulfill this expected role, there could be an adverse impact on liquidity and the valuation of an ETF.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

Short Sales

A short sale involves the sale of a security that the Client does not own in the hope of purchasing the same security at a later date at a lower price. To make delivery to the buyer, the Client must borrow the security and is obligated to return the security to the lender, which is accomplished by a later purchase of the security. The Client realizes a profit or a loss as a result of a short sale if the price of the security decreases or increases respectively between the date of the short sale and the date on which the Client covers its short position, i.e., purchases the security to replace the borrowed security. A short sale involves the theoretically unlimited risk of an increase in the market price of the security that would result in a theoretically unlimited loss.

Frequent Trading

Frequent trading in securities can result in higher transaction costs in the Client's account[s]. For taxable accounts, frequent trading can also result in taxable transactions each year that would not be present in a buy-and-hold strategy. There are no guarantees that a frequent trading strategy will correctly time purchases and sales of any particular security.

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Cryptocurrency Risks

Cryptocurrency is a digital representation of value that functions as a medium of exchange, a unit of account, or a store of value, but it does not have legal tender status. Cryptocurrency is not backed nor supported by any government or central bank. Its price is completely derived by market forces of supply and demand, and it is more volatile than traditional currencies and financial assets. Purchasing cryptocurrencies comes with a number of risks, including volatile market price swings or flash crashes, market manipulation, and cybersecurity risks. In addition, cryptocurrency markets and exchanges are not regulated with the same controls or customer protections available in equity, option, futures, or foreign exchange investing. There is no assurance that a person who accepts a cryptocurrency as payment today will continue to do so in the future.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving Resolute or any of its management persons. Resolute values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 125739.

Item 10 – Other Financial Industry Activities and Affiliations

Accounting and Tax Services

The Advisor may also assist Clients in accounting services and the preparation of federal and state tax returns. Depending on the terms of the agreement with each Client, the cost for these services may or may not be included in the Advisor's fees. The Advisor receives minimal income derived from accounting and tax preparation services. Clients are under no obligation to engage the Advisor for accounting or tax preparation services.

Licensed Insurance Professionals

Certain Advisory Persons are licensed insurance professionals. These Advisory Persons have no insurance agency affiliation[s] and will not actively sell any insurance product under any circumstance. Advisory Persons have obtained an insurance license for the sole purpose of servicing Clients of Resolute in certain states requiring licensure.

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

A. Code of Ethics

Resolute has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with Resolute ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. Resolute and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Resolute associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at 978-463-8771 or via email at info@resolutefinancial.com.

B. Personal Trading with Material Interest

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

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C. Personal Trading in Same Securities as Clients

Resolute allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Resolute requiring reporting of personal securities trades by its Supervised Persons to the Chief Compliance Officer ("CCO") or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Resolute allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically executed after Client orders. **At no time will Resolute, or any associated person of Resolute, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

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

Where Resolute does not exercise discretion over the selection of the Custodian, the Advisor may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by Resolute. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not utilized. Resolute may recommend a Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or the location of the Custodian's offices.

Resolute does not receive research services, other products, or compensation as a result of recommending a Custodian that may result in the Client paying higher commissions than those obtainable through other custodians. Resolute will generally recommend that Clients establish their account[s] at TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade") or with Fidelity Clearing & Custody Solutions and related entities of Fidelity Investments, Inc. (collectively "Fidelity"). TD Ameritrade and Fidelity are "qualified custodians", FINRA-registered broker-dealers and member SIPC. Fidelity or TD Ameritrade will serve as the Client's Custodian. Resolute maintains an institutional relationship with Fidelity and TD Ameritrade, whereby the Advisor receives economic benefits. Please see Item 14 below.

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

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

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

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

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Resolute will execute its transactions through the Custodian as directed by the Client. Resolute will not aggregate orders in a block trade or trades when securities are purchased or sold through the same Custodian for multiple (discretionary) accounts, which may result in the Client paying higher commissions on each transaction. Transactions will be done in a way that does not consistently advantage or disadvantage particular Clients’ accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Johnson, CCO of Resolute. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

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

C. Review Reports

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

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by Resolute

Resolute is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. Resolute does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. Resolute may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Resolute may receive referrals of new Clients from a third-party.

Participation in Institutional Advisor Platform – Fidelity

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

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Additionally, the Advisor may receive the following benefits from Fidelity: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

Participation in Institutional Advisor Platform – TD Ameritrade

As disclosed under Item 12, above, the Advisor participates in TD Ameritrade's institutional customer program and the Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between the Advisor's participation in the program and the investment advice it gives to its Clients, although the Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving the Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by the Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit the Advisor but may not benefit its Client accounts. These products or services may assist the Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help the Advisor manage and further develop its business enterprise. The benefits received by the Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, the Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by the Advisor or its related persons in and of itself creates a conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

B. Client Referrals from Solicitors

Resolute does not engage paid solicitors for Client referrals.

Item 15 – Custody

Resolute does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees and certain money movement authority as described below. All Clients must place their assets with a "qualified custodian." Clients are required to engage the Custodian to retain their funds and securities and direct Resolute to utilize the Custodian for the Client's security transactions. Resolute encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Item 16 – Investment Discretion

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

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Item 17 – Voting Client Securities

Resolute does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

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

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Definitions: Form ADV Part 2B – Brochure Supplements

The Form ADV2B (“Brochure Supplement”) provides information regarding the advisors of the firm. Included in the descriptions are two terms that require further definition. They are CFP®, and EA, shown below:

Certified Financial Planner™ (“CFP®”)

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

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

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

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board’s studies have determined as necessary for the competent and professional delivery of financial planning services and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

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- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination, administered in two 3 hour exams, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

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

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

Enrolled Agent ("EA")

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

- 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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Form ADV Part 2B – Brochure Supplement for

**Charles M. Johnson, CFP®
Chief Compliance Officer**

Effective: March 2, 2021

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Charles M. Johnson, CFP®, (CRD# **5082505**) in addition to the information contained in the Resolute Financial, LLC (“Resolute” or the “Advisor”) (CRD # 125739) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Resolute Disclosure Brochure or this Brochure Supplement, please contact the Advisor at 978-463-8771 or by email at info@resolutefinancial.com.

Additional information about Mr. Johnson is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5082505.

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Item 2 – Educational Background and Business Experience

Charles Johnson, CFP®, born in 1955, is dedicated to advising Clients of Resolute in his role as the Chief Compliance Officer. Mr. Johnson earned a Bachelor of Science degree in Mechanical Engineering from Worcester Polytechnic Institute in 1977. Mr. Johnson also earned a Masters in Business Administration from Cornell University in 1981. Additional information regarding Mr. Johnson's employment history is included below.

Employment History:

Chief Compliance Officer, Resolute Financial, LLC	01/2006 to Present
CFO, Everett Pattern & MFG., Inc.	12/1984 to 12/2005

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Johnson. Mr. Johnson has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Johnson.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Johnson.***

However, the Advisor does encourage you to independently view the background of Mr. Johnson on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5082505.

Item 4 – Other Business Activities

Mr. Johnson is dedicated to the investment advisory activities of Resolute's Clients. Mr. Johnson does not have any other business activities.

Item 5 – Additional Compensation

Mr. Johnson is dedicated to the investment advisory activities of Resolute's Clients. Mr. Johnson does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Johnson serves as the Chief Compliance Officer of Resolute. Mr. Johnson can be reached at 978-463-8771 ext. 1001.

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

Form ADV Part 2B – Brochure Supplement

For

**Robert T. Ryan, JD, CFP®
Chief Investment Officer**

Effective: March 2, 2021

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Robert T. Ryan, JD, CFP®, (CRD# **1053505**) in addition to the information contained in the Resolute Financial, LLC (“Resolute” or the “Advisor”) (CRD # 125739) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Resolute Disclosure Brochure or this Brochure Supplement, please contact the Advisor at 978-463-8771 ext. 1001 or by email at info@resolutefinancial.com.

Additional information about Mr. Ryan is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his individual CRD# 1053505.

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Item 2 – Educational Background and Business Experience

Robert Ryan, JD, CFP®, born in 1950, is dedicated to advising Clients of Resolute as the Chief Investment Officer. Mr. Ryan earned a Bachelor of Arts degree in Political Science from Tufts University in 1972. Mr. Ryan also earned a Juris Doctor degree from New England School of Law in 1981. In addition, Mr. Ryan earned a Master of Science degree in Personal Financial Planning from Bentley University in 1999. Additional information regarding Mr. Ryan's employment history is included below.

Employment History:

Chief Investment Officer, Resolute Financial, LLC	01/2005 to Present
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Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Ryan. Mr. Ryan has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Ryan.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Ryan.***

However, the Advisor does encourage you to independently view the background of Mr. Ryan on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his individual CRD# 1053505.

Item 4 – Other Business Activities

Licensed Insurance Agent

Mr. Ryan is a licensed insurance professional. Mr. Ryan has no insurance agency affiliation and will not sell any insurance products. Mr. Ryan obtained an insurance license for the sole purpose of servicing Clients of Resolute in certain states requiring licensure.

Item 5 – Additional Compensation

Mr. Ryan is dedicated to the investment advisory activities of Resolute's Clients. Mr. Ryan does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Ryan serves as the Chief Investment Officer of Resolute and is supervised by Charles Johnson, the Chief Compliance Officer. Mr. Johnson can be reached at 978-463-8771 ext. 1001.

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

Form ADV Part 2B – Brochure Supplement

For

**Thomas G. Dwyer, CFP®, EA
Chief Financial Officer**

Effective: March 2, 2021

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Thomas G. Dwyer, CFP®, (CRD# **3051277**) in addition to the information contained in the Resolute Financial, LLC (“Resolute” or the “Advisor”) (CRD # 125739) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Resolute Disclosure Brochure or this Brochure Supplement, please contact the Advisor at 978-463-8771 ext. 1001 or by email at info@resolutefinancial.com.

Additional information about Mr. Dwyer is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 3051277.

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Item 2 – Educational Background and Business Experience

Thomas Dwyer, CFP®, born in 1958, is dedicated to Clients of Resolute in his role as the Chief Financial Officer. Mr. Dwyer earned a Bachelor of Arts degree in Political Science from Lawrence University in 1980. Mr. Dwyer also earned a Certificate in Financial Planning from Boston University in 2000. Additional information regarding Mr. Dwyer's employment history is included below.

Employment History:

Chief Financial Officer, Resolute Financial, LLC	10/2003 to Present
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Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Dwyer. Mr. Dwyer has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Dwyer.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Dwyer.***

However, the Advisor does encourage you to independently view the background of Mr. Dwyer on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 3051277.

Item 4 – Other Business Activities

Mr. Dwyer is dedicated to the investment advisory activities of Resolute's Clients. Mr. Dwyer does not have any other business activities.

Item 5 – Additional Compensation

Mr. Dwyer is dedicated to the investment advisory activities of Resolute's Clients. Mr. Dwyer does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Dwyer serves as the Chief Financial Officer of Resolute and is supervised by Charles Johnson, the Chief Compliance Officer. Charles Johnson can be reached at 978-463-8771 ext. 1001.

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

Form ADV Part 2B – Brochure Supplement

for

**George J. Paquin, CFP®
Senior Financial Planner**

Effective: March 2, 2021

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of George J. Paquin, CFP®, (CRD# **2396003**) in addition to the information contained in the Resolute Financial, LLC (“Resolute” or the “Advisor”) (CRD # 125739) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Resolute Disclosure Brochure or this Brochure Supplement, please contact the Advisor at 978-463-8771 or by email at info@resolutefinancial.com.

Additional information about Mr. Paquin is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his individual CRD # 2396003.

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Item 2 – Educational Background and Business Experience

George Paquin, CFP®, born in 1946, is dedicated to advising Clients of Resolute as a Senior Financial Planner. Mr. Paquin earned a Bachelor of Science degree in Mechanical Engineering from Northeastern University in 1968. Mr. Paquin also earned a Masters in Business Administration from Clark University in 1994. Additional information regarding Mr. Paquin's employment history is included below.

Employment History:

Senior Financial Planner, Resolute Financial, LLC	02/2011 to Present
President/Proprietor, G Paquin, CFP®	06/2003 to 12/2010

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Paquin. Mr. Paquin has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Paquin.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Paquin.***

However, the Advisor does encourage you to independently view the background of Mr. Paquin on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his individual CRD# 2396003.

Item 4 – Other Business Activities

Mr. Paquin is dedicated to the investment advisory activities of Resolute's Clients. Mr. Paquin does not have any other business activities.

Item 5 – Additional Compensation

Mr. Paquin is dedicated to the investment advisory activities of Resolute's Clients. Mr. Paquin does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Paquin serves as a Senior Financial Planner of Resolute and is supervised by Charles Johnson, the Chief Compliance Officer. Mr. Johnson can be reached at 978-463-8771 ext. 1001.

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

Form ADV Part 2B – Brochure Supplement

for

**William A. Simpson, CFP®
Managing Partner**

Effective: March 2, 2021

This Brochure Supplement provides information about the background and qualifications of William A. Simpson, CFP®, (CRD# **5038165**) in addition to the information contained in the Resolute Financial, LLC ("Resolute" or the "Advisor") (CRD # 125739) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Resolute Disclosure Brochure or this Brochure Supplement, please contact the Advisor at 978-463-8771 or by email at info@resolutefinancial.com.

Additional information about Mr. Simpson is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5038165.

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Item 2 – Educational Background and Business Experience

William A. Simpson, CFP®, born in 1961, is dedicated to advising Clients of Resolute in his role as a Managing Partner. Mr. Simpson earned a Masters in Business Administration from Boston College in 1992. Mr. Simpson also earned a Bachelor of Science degree in Mechanical Engineering from Worcester Polytechnic Institute in 1984. Additional information regarding Mr. Simpson's employment history is included below.

Employment History:

Managing Partner, Resolute Financial, LLC	04/2016 to Present
President, Azimuth Financial Planning, LLC	12/2007 to 03/2017
Co-Advisor, The Harbor Group	11/2005 to 12/2007

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Simpson. Mr. Simpson has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Simpson.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Simpson.***

However, the Advisor does encourage you to independently view the background of Mr. Simpson on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5038165.

Item 4 – Other Business Activities

Licensed Insurance Agent

Mr. Simpson is a licensed insurance professional. Mr. Simpson has no insurance agency affiliation and will not sell any insurance products. Mr. Simpson obtained an insurance license for the sole purpose of servicing Clients of Resolute in certain states requiring licensure.

Item 5 – Additional Compensation

Mr. Simpson is dedicated to the investment advisory activities of Resolute's Clients. Mr. Simpson does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Simpson serves as a Managing Partner of Resolute and is supervised by Charles Johnson, the Chief Compliance Officer. Mr. Johnson can be reached at 978-463-8771 ext. 1001.

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

Form ADV Part 2B – Brochure Supplement

for

**Stephanie C. Griebel, CFP®
Senior Financial Planner**

Effective: March 2, 2021

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Stephanie C. Griebel, CFP®, (CRD# 5879108) in addition to the information contained in the Resolute Financial, LLC (“Resolute” or the “Advisor”, CRD# 125739) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Resolute Disclosure Brochure or this Brochure Supplement, please contact the Advisor at 978-463-8771 ext. 1001 or by email at info@resolutefinancial.com.

Additional information about Ms. Griebel is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 5879108.

Resolute Financial, LLC

102 State Street, Suite E, Newburyport, MA 01950-6639

Phone: 978-463-8771 * Fax: 978-463-8774

www.ResoluteFinancial.com

Item 2 – Educational Background and Business Experience

Stephanie C. Griebel, CFP®, born in 1978, is dedicated to advising Clients of Resolute as a Senior Financial Planner of Resolute. Ms. Griebel earned a Bachelor of Science degree in Business Administration from Northeastern University in 2001. Additional information regarding Ms. Griebel's employment history is included below.

Employment History:

Senior Financial Planner, Resolute Financial, LLC	01/2017 to Present
Sr Investment Advisor, KPF Global Investment Strategies, LLC	08/2011 to 07/2016
Investment Advisor, Artemis Financial Advisors	11/2008 to 08/2011
Portfolio Coordinator, Wellington Management Company	07/2004 to 05/2008

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Griebel. Ms. Griebel has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Griebel.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Griebel.***

However, the Advisor does encourage you to independently view the background of Ms. Griebel on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 5879108.

Item 4 – Other Business Activities

KPF Global Investment Strategies, LLC

Ms. Griebel also has a minor ownership interest in KPF Global Investment Strategies, LLC ("KPF"), a registered investment advisor (CRD# 158478). Ms. Griebel is compensated solely through revenue generated by KPF. Neither the Advisor nor Ms. Griebel will recommend that Client's place assets with KPF. Additionally, Ms. Griebel does not spend any time for this activity.

Item 5 – Additional Compensation

Ms. Griebel has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Ms. Griebel serves as a Senior Financial Planner of Resolute and is supervised by Charles Johnson, the Chief Compliance Officer. Mr. Johnson can be reached at 978-463-8771 ext. 1001.

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

Privacy Policy

Effective Date: March 2, 2021

Our Commitment to You

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

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

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

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

Why you need to know?

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

What information do we collect from you?

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

What Information do we collect from other sources?

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

How do we protect your information?

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

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

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How do we share your information?

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

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

State-specific Regulations

Massachusetts	In response to Massachusetts law, the Client must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. Client opt-in is obtained through the Client’s execution of authorization forms provided by the third parties, by executing an Information Sharing Authorization Form, or by other written consent by the Client, as appropriate and consistent with applicable laws and regulations.
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Changes to our Privacy Policy

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

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

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at 978-463-8771 or via email at info@resolutefinancial.com.