



Jaffe Tilchin Investment Partners, LLC.

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Disclosure Brochure Retail Services

March 25, 2022

This brochure provides information about the qualifications and business practices of Jaffe Tilchin Investment Partners, LLC. If you have any questions about the contents of this brochure, please contact us at 813.963.2500. 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.

Jaffe Tilchin Investment Partners, LLC is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you determine to hire or retain an adviser.

Additional information about Jaffe Tilchin Investment Partners, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Form ADV Part 2A Disclosure Brochure

Item 2: Material Changes

Jaffe Tilchin Investment Partners, LLC (“Jaffe Tilchin, we, us, our, ours”) has made no material changes to our disclosure brochures since the last annual update dated March 30, 2021.

You may request our brochure by contacting our Chief Compliance Officer 813.963.2500 or Scott@JaffeTilchin.com. We will provide you with a new brochure at any time without charge.

Additional information about our company, including our brochure, is also available via the SEC’s website: www.adviserinfo.sec.gov. This website also provides information about any persons affiliated with Jaffe Tilchin who are registered as investment adviser representatives of Jaffe Tilchin. Information on our investment adviser representatives who work with your account can be found in our brochure supplements.

Jaffe Tilchin Investment Partners, LLC

SEC File Number 801-67720

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Item 4: Advisory Business

Jaffe Tilchin is a Limited Liability Company organized under the laws of Florida. Scott Jaffe and Louis Tilchin founded the Tampa-based investment advisory firm in 2007 and are the principal owners.

Jaffe Tilchin is a member of the Jaffe Tilchin Wealth Management family of companies. Jaffe Tilchin also has a separate operating division doing business under the name Jaffe Tilchin Institutional Consulting, which specializes in pension consulting services. Information about the institutional services offered by this division of Jaffe Tilchin and the accompanying fees and charges can be found in the related Institutional Services Disclosure Brochure.

Jaffe Tilchin Model Portfolios

We may recommend one or more of the model managed portfolios of which it directly manages. We manage these accounts on a continuous basis. You are advised that your account may be similar to multiple other clients selecting the same model portfolio. We provide assistance in selecting a model(s) suitable to your investment strategy. You grant discretionary authorization for us to buy and sell securities as deemed appropriate by our Investment Committee. You may contact us at any time to discuss your account.

Mutual Fund Asset Allocation

We may recommend that your assets be invested in various mutual funds from a recommended list of funds. We customize your portfolio to meet your individual goals and objectives. Your portfolio may or may not resemble portfolios recommended for our other clients. All mutual funds on the recommended list are no-load mutual funds or load waived funds.

Unaffiliated Asset Managers

We may contract with third party, unaffiliated asset managers to manage all or part of your portfolio. These third-party investment managers may manage accounts or private investment funds or vehicles for qualified investors. We will use the information you have provided about your investment objectives, goals, time horizon, and risk tolerances, as well as other relevant information, to identify a third-party investment manager(s) whose investment strategies or investment vehicles appear appropriate for you. Some of the other relevant information considered in recommending a third-party asset manager include (but are not limited to):

- ✦ Your preference for certain types of investment strategies;
- ✦ The size and composition of your investment account;

- ✦ Your tax considerations;
- ✦ Our prior experience with and preferences for particular investment managers;
- ✦ The fees charged by the investment manager; and
- ✦ The experience and capabilities of the investment manager.

We contact you at least annually or more often as we agree to review your financial situation and objectives, communicate information to the third party manager managing the account or investment vehicle as warranted, and to assist you in understanding and evaluating the services provided by the third party manager.

Financial Planning Services

For certain clients, we prepare and provide you with a comprehensive, written financial plan designed to help you achieve your financial goals and investment objectives. The preparation of such a plan requires that you provide us with personal data such as family records, employment records, budgeting, assets, liabilities, estate information, and tax information. The financial plan may address any or all of the following as you request and/or direct:

- ✦ Asset protection
- ✦ Financial Planning
- ✦ Tax planning
- ✦ Estate planning
- ✦ Education planning
- ✦ Retirement analysis
- ✦ Cash Flow
- ✦ Charitable gifting

Should you choose to implement the recommendations contained in your financial plan, we encourage you to work closely with your attorney, accountant, insurance agent, and other advisers. We will assist you to the extent you choose.

Although you may choose to implement the recommendations made in your financial plan through us, you are free to employ the services of any advisor or registered representative of your choice, regardless of whether or not that person is associated with Jaffe Tilchin.

Variable Annuity Sub-Account Management

We provide ongoing management of variable annuity sub accounts.

General Institutional Consulting

Jaffe Tilchin Institutional Consulting serves as an investment consultant for 401(k)

plans, Defined Contribution Plans, Defined Benefit Plans, Cash Management Accounts, Non-Qualified Deferred Comp Plans, Endowments and Foundations, providing the following services for the benefit of participants and their beneficiaries:

- ✦ plan needs assessment,
- ✦ investment policy statement review or creation,
- ✦ recommendation of investment options,
- ✦ monitoring investment performance,
- ✦ periodic fee review,
- ✦ coordination of investment committee services,
- ✦ facilitation of provider selection, and
- ✦ plan design.

Needs and Restrictions

In managing your investment portfolio, we consider your financial situation, risk tolerance, investment time horizon, liquidity needs, tax considerations, investment objectives, and any other issues important to you and your state of affairs.

You should notify us promptly of any changes in your objectives, goals, and risk tolerances, as well as any other material changes in your personal circumstances (such as your employment, marital status, financial condition, etc.). These changes may require changes in your investment account and the investment strategies employed.

You may impose any reasonable restrictions upon the manner in which we manage your investment account. For example, you may restrict the management of your account to certain types of investment products or investment strategies.

Retirement Rollovers

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act of 1974, as amended (“ERISA”) and/or the Internal Revenue Code (the “Code”), as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

Under this special rule’s provisions, we must:

- ✦ Meet a professional standard of care when making investment recommendations (give prudent advice);

- ✦ Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- ✦ Avoid misleading statements about conflicts of interest, fees, and investments;
- ✦ Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- ✦ Charge no more than is reasonable for our services; and
- ✦ Give you basic information about conflicts of interest.

When providing recommendations to retirement plan accounts involving rollover considerations, there are generally four options regarding an existing retirement plan account. An employee may use a combination of those options, such as; (i) leave the funds in the former employer's plan, if permitted, (ii) roll over the funds to a new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the individual's age, result in adverse tax consequences). If your designated investment adviser representative recommends that you rollover your retirement plan assets into an account to be managed by our firm, such recommendation creates a conflict of interest insofar as we will earn an advisory fee on the rolled over assets. You are under no obligation to roll over retirement plan assets to an account managed by us.

Assets under Management

As of December 31, 2021, through both our institutional and retail asset management services, we managed approximately \$1,366,597,149 in client assets on a discretionary basis where we made all of the investment decisions. We managed approximately \$120,267,621 on a non-discretionary basis where clients made investment decisions based on our recommendations.

Item 5: Fees and Compensation

Jaffe Tilchin Equity Model Portfolios Fees

This program is offered on a wrap fee basis in which all transaction fees and advisory fees are included within the program fees that you pay. Additional information about the Jaffe Tilchin Model Portfolios program and the accompanying fees and charges can be found in the related Wrap Fee Program Brochure. You are strongly advised to review this brochure prior to investing in the program.

Mutual Fund Asset Allocation Fees

We charge a maximum fee of 1% based upon the dollar amount of assets under management for mutual fund portfolio management. All fees are negotiable at our sole

discretion.

Unaffiliated Asset Managers Fees

Fees are dependent upon the third party manager who may require a minimum investment. Their fees may or may not be negotiable. We typically receive your fee directly from the custodian of your assets. The fee we receive from the custodian generally has already had the third party manager fee deducted; if it has not the third party manager then receives their fee from us.

A complete description of:

- the programs and services provided,
- the amount of total fees,
- the payment structure including, but not limited to, whether the fees are billed in arrears or advance and how fees are calculated,
- termination provisions, and
- other aspects of each program are detailed and disclosed in the unaffiliated asset manager's brochure; wrap brochure (if available) or other applicable disclosure documents; and the unaffiliated asset managers' account opening documents.

A copy of all relevant disclosure documents of the unaffiliated asset manager and of the individual portfolio manager(s) are provided to anyone interested in these programs or managers.

In addition to paying investment management fees, private funds or investment vehicles are subject to other investment expenses such as custodial charges, brokerage fees, commissions, and administrator costs plus expenses including, but not limited to, sales expenses, legal expenses, internal and external accounting, audit and tax preparation expenses; and organizational expenses. Private fund fees and expenses are passed on to the fund investors. To invest in private funds, the receipt and completion of special documents is required and all additional expenses are delineated in these.

Fees for Financial Planning Services

Fees for financial planning services are charged on a fixed-fee basis. The amount you will be charged will be negotiated between you and Jaffe Tilchin. Generally, the amount of our fees will depend upon the complexity of the services you need. Fixed fees may range from \$1,000 to \$40,000 per plan. We will provide you with an estimate of the cost of the services to be provided to you prior to beginning the financial planning process.

Fixed fees are payable upon completion of the services outlined in the executed financial planning agreement. Alternatively, you may elect pay this fee on a quarterly basis. Under

this arrangement, one-quarter (1/4) of the fee will be due upon execution of our financial planning agreement and one-quarter (1/4) of the fee will be billed quarterly in advance thereafter until either the fee is paid in full or we have provided all of the services we agreed to provide to you. In that case, the balance of the fee will be due in its entirety.

The Financial Planning Agreement may be terminated upon written notice by either party. Unearned fees paid in advance will be refunded pro rata, based on the work completed.

Fees for Variable Annuity Sub-Account Management

The fee for VA sub account management is 1% based upon the net asset value of the sub-accounts as of the last day of the calendar quarter. This fee is non-negotiable. We will only use no-load variable annuity products in an advisory account. However, variable annuity investments can also carry large internal fees, which is in addition to the advisory fee we charge.

Fees for General Institutional Consulting

Our fee schedule is described below:

<u>Plan Asset Balance</u>	<u>Annual Fee¹</u>
Up to \$5,000,000	1.00%
\$5,000,001 to \$15,000,000	0.75%
\$15,000,001 to \$30,000,000	0.65%
\$30,000,001 to \$60,000,000	0.50%
\$60,000,001 to \$100,000,000	0.45%

¹*Fees are negotiable at our sole discretion.*

Broker-dealers and other financial institutions that hold client accounts are referred to as custodians (hereinafter referred to as “custodian/broker-dealer”). Your custodian/broker-dealer determines the values of the assets in your portfolio.

You must authorize us in writing to have the custodian/broker-dealer pay our investment advisory fees directly to us by charging your account. This authorization is set forth in the investment advisory agreement you will execute to retain our services. One-fourth of the annual fee is charged each calendar quarter.

Your custodian/broker-dealer will provide you with statements that show the amount paid directly to us. You should verify the calculation of our fees. Your

custodian/broker-dealer does not verify the accuracy of fee calculations.

In addition to our fee, you may be required to pay other charges such as:

- Custodial fees,
- Brokerage commissions
- Transactions fees,
- SEC fees
- Internal fees and expenses charged by mutual funds or exchange traded funds (“ETFs”), and variable annuities; and
- Other fees and taxes on brokerage accounts and securities transactions.

None of these fees are paid to us or shared with us.

Mutual fund companies, ETFs, and variable annuity issuers charge internal fees and expenses for their products. These fees and expenses are in addition to any advisory fees charged by us. Complete details of these internal fees and expenses are explained in the prospectuses for each investment. You are strongly encouraged to read these explanations before investing any money. You may ask us any questions you have about fees and expenses.

If you purchase mutual funds through the custodian/broker-dealer, you may pay a transaction fee that would not be charged if the transactions were made directly through the mutual fund company. Also, mutual funds held in accounts at brokerage firms may pay internal fees that are different from funds held at the mutual fund company.

While you may purchase shares of mutual funds directly from the mutual fund company without a transaction fee, those investments would not be part of our advisory relationship with you. This means that they would not be included in our investment strategies, investment performance monitoring, or portfolio reallocations.

Variable annuity investments can also carry large internal fees, which are in addition to the advisory fee we charge.

No advisory fees are charged on any mutual funds or unit investment trusts transferred into your account which were purchased within the preceding two years if a commission was paid to your advisory representative as a representative of a broker-dealer.

With respect to certain of our clients who maintain margin accounts under our management, please be advised that upon negotiation, our percentage of assets fee may be billed on your total account balances, that is the total of debit and credit balances, not your net balance. This creates a conflict of interest inasmuch as taking on more risk

in your account (increasing your leverage) will serve to increase our fee. This may incent us to take on more risk in your margin account in order to increase our fee.

Please be sure to read the section entitled “Brokerage Practices,” which follows later in this brochure.

All advisory fees are billed quarterly, in advance as contractually agreed, and are based upon market value of the account on the last business day of the preceding calendar quarter. If you agree to pay our investment advisory fees in advance and you terminate the advisory agreement we have entered into within five (5) business days from the date the agreement is executed, you will receive a full refund of any fees paid. Should either one of us terminate the advisory agreement before the end of a billing period, any unearned fees that were deducted from your account will be returned to you by us.

The amount refunded to you is calculated by dividing the most recent advisory fee you paid by the total number of days in the quarter. This daily fee is then multiplied by the number of calendar days in the quarter that our agreement was in effect. This amount, which equals the amount we earned for the partial quarter, is subtracted from the total fee you paid in advance to determine your refund.

We may also refer you to various asset management firms. Referral fees or a portion of the advisory fee will be paid to us if you establish a relationship with the asset manager.

The above arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation we receive rather than based upon your needs. We will explain the specific costs associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Item 6: Performance-Based Fees

Performance-based fees are designed to give a portion of the returns of an investment to the investment adviser as a reward for positive performance. The fee is generally a percentage of the profits made on the investments. We do not charge performance-based fees on any of our client accounts. Some of the unaffiliated third-party managers we recommend charge a performance fee, however we do not receive any portion of any performance-based fee such managers charge.

Item 7: Types of Clients

We offer professional asset management services to individuals, trusts, estates, charitable organizations, corporations and pension plans. As a condition for starting and maintaining an advisory relationship, we generally require a minimum portfolio size of \$25,000.

We, at our sole discretion, may accept clients with smaller portfolios based upon certain factors including:

- anticipated future earning capacity,
- anticipated future additional assets,
- account composition,
- related accounts, and
- pre-existing client relationships.

We may consider the portfolios of your family members to determine if your portfolio meets the minimum size requirement. There is a minimum quarterly fee of \$50. We reserve the right to waive or reduce this fee.

We may contract with third party, unaffiliated asset managers to manage all or part of your portfolio. These third-party managers may have their own minimum size requirements that will be outlined in their disclosure documents. Investors in private funds or investment vehicles are required to own or have a specified amount of assets and/or net worth. The completion of special documents are required prior to investing; minimum account sizes are specified.

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

We select specific investments for your portfolios through the use of fundamental and cyclical analysis. Fundamental analysis is a method of evaluating a company that has issued a security by attempting to measure the value of its underlying assets. It entails studying overall economic and industry conditions as well as the financial condition and the quality of the company's management. Earnings, expenses, assets, and liabilities are all important in determining the value of a company. The value is then compared to the current price of the issuing company's security to determine whether to purchase, sell or hold the security.

Cyclical analysis is a form of fundamental analysis that involves the process of making investment decisions based on the different stages of an industry at a given point in time.

Our investment strategies may include long-term and short-term purchases and sales, margin, trading (securities sold within 30 days) and short sales. You may place reasonable restrictions on the strategies to be employed in your portfolio and the types

of investments to be held in your portfolio.

All investments involve risks that can result in loss:

- loss of principal,
- a reduction in earnings (including interest, dividends and other distributions), and
- the loss of future earnings.

Additionally, these risks may include:

- market risk,
- interest rate risk,
- issuer risk, and
- general economic risk.

As previously noted, we may recommend the use of third-party investment managers to implement our investment advice. We analyze individual investment managers based upon their investment strategies, experience, performance track record, reputations, and fee arrangements. In addition, periodic performance updates are conducted to ascertain that the investment manager still fulfills a client's mandate and goals.

Although we manage your portfolio in a manner consistent with your risk tolerances, we cannot guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

You must also be aware that the use of margin, options and short sales are higher risk strategies. It is possible to lose all of the principal you invest, and sometimes more. In a cash account, your risk is limited to the amount of money that you have invested. In a margin account, your risk includes the amount of money invested plus the amount that has been loaned to you. When you short sell, your losses can be infinite. Additionally, frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Item 9: Disciplinary Information

Jaffe Tilchin has not been the subject of any civil, criminal or regulatory action or disciplinary event that would be material to your evaluation of our business or the integrity of our management. Lou Tilchin and Scott Jaffe have previously been named in customer complaints which were settled. These are more fully described in the supplements to this brochure. Additional information is available at <https://brokercheck.finra.org>.

Item 10: Other Financial Industry Activities and Affiliations

In addition to their position with Jaffe Tilchin, your advisory representative may also be a registered representative with APW Capital, Inc. (“APW”), a registered broker-dealer (member FINRA/SIPC). You are under no obligation to purchase or sell securities through your advisory representative in conjunction with their association with APW. If you do so, however, they may earn compensation in the form of commissions or investment advisory fees.

Jaffe Tilchin Investment Partners, LLC is affiliated with Jaffe Tilchin Wealth Management and RCR Financial, through common ownership. Jaffe Tilchin Wealth Management and RCR Financial are insurance agencies and offer commissionable insurance products.

Certain advisory representatives are also licensed as insurance agents. You are under no obligation to purchase insurance products from Jaffe Tilchin Wealth Management, RCR Financial, or any advisory representative. If you choose to purchase insurance, these firms and individuals will receive commissions in addition to the advisory fees you pay to us.

As noted above, when appropriate, we provide individualized advisory services to you through the recommendation of suitable third-party investment advisers. Because the compensation we receive may vary depending upon the adviser selected, we may have a conflict of interest in recommending certain advisers to you. To address this potential conflict we consider the following factors in the selection of a third-party adviser which include, but may not be limited to:

- the management style, performance, reputation, pricing and reporting capabilities of the third-party investment adviser;
- your risk tolerance, goals and objectives, as well as investment experience; ➤ the amount of assets you have available for investment; and
- our familiarity with and preference for a particular adviser.

You are under no obligation to follow our recommendations.

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

We have adopted a *Code of Ethics* (“Code”) to address the securities-related conduct of our advisory representatives and employees. The *Code* includes our policies and procedures developed to protect your interests in relation to the following:

- the duty at all times to place your interests ahead of ours;
- that all personal securities transactions of our advisory representatives and employees be conducted in a manner consistent with the *Code* and avoid any actual

or potential conflict of interest, or any abuse of an advisory representative's or employee's position of trust and responsibility;

- that advisory representatives may not take inappropriate advantage of their positions;
- that information concerning the identity of your security holdings and financial circumstances are confidential; and
- that independence in the investment decision-making process is paramount.

We will provide a copy of the *Code* to you or any prospective client upon request.

We do not buy or sell securities for our firm that we also recommend to clients. Our advisory representatives and employees are permitted to buy or sell the same securities for their personal and family accounts that are bought or sold for your account(s). The personal securities transactions by advisory representatives and employees may raise potential conflicts of interest when they trade in a security that is:

- owned by you or
- considered for purchase or sale for you.

We have adopted policies and procedures that are intended to address these conflicts of interest. These policies and procedures:

- require our advisory representatives and employees to act in your best interest,
- prohibit favoring one client over another, and
- provide for the review of transactions to discover and correct any same-day trades that result in an advisory representative or employee receiving a better price than a client.

Advisory representatives and employees must follow our procedures when purchasing or selling the same securities purchased or sold for you.

Item 12: Brokerage Practices

We will generally recommend Fidelity Brokerage Services, LLC ("Fidelity") and/or TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade") (collectively or separately, "Custodian") to you for custody and brokerage services although we may agree to employ the services of one or more other custodians.

We are independently owned and operated and not affiliated with the Custodian we recommend. Our use of the Custodian is, however, a beneficial business arrangement for us and for the Custodian. Information regarding the benefits of this relationship is described below.

Our recommendation of a specific custodian is based in part on our existing

relationships; the custodian's financial strength; reputation; breadth of investment products; and, the cost and quality of custody and brokerage services provided to you and our other clients.

The determining factor in the selection of the Custodian to execute transactions for your accounts is not the lowest possible transaction cost, but whether the Custodian can provide what is in our view the best qualitative execution for your account.

In addition to brokerage and custody services, services customarily made available to advisers include access to investments generally available to institutional investors; research; software; and, educational opportunities. Custodians may also make available or arrange for these types of services to be provided to us by independent third parties. Custodians may discount or waive the fees they would otherwise charge for some of the services they make available to us. They may also pay all or a part of the fees of a third party providing these services to us.

We receive economic benefits as a result of our relationship with the custodians because we do not have to produce or purchase the products and services listed above. These services are not contingent upon us committing any specific amount of business to the custodians in trading commissions. We do not have any formal soft-dollar agreements with custodians or brokers.

Because the amount of our compensation or the products or services we receive may vary depending on the custodian we recommend to be used by our clients, we may have a conflict of interest in making that recommendation. Our recommendation of a specific custodian may be based in part on the economic benefit to us and not solely on the nature, cost or quality of custody and brokerage services provided to you and our other clients. We nonetheless strive to act in your best interests at all times.

The custodians do not charge separately for holding our client accounts, but may be compensated by you through other transaction-related fees associated with the securities transactions they execute for your account.

Commissions and other fees for transactions executed through the Custodian may be higher than commissions and other fees available if you use another custodian/broker-dealer firm to execute transactions and maintain custody of your account. We believe, however, that the overall level of services and support provided to our clients by the Custodian outweighs the benefit of possibly lower transactions cost which may be available under other brokerage arrangements.

Many of the services described above may be used to benefit all or a substantial number of our accounts, including accounts not maintained at through the Custodian. We do

not attempt to allocate these benefits to specific clients.

Third party asset managers may require the use of certain custodians. Please refer to the Brokerage Practices sections of their respective brochures for more information. We may also receive economic and non-economic benefit from third-party asset managers we utilize in the form of the support products and services it makes available to use, such as research, technology or administrative support. The availability of these products and services are not based upon us giving particular investment advice, such as buying particular securities for our clients. The total advisory fee the client pays will not be higher because we accept these benefits.

Directed Custodian

We do not accept directed custodian. You may choose Fidelity or TD Ameritrade as the custodian of your account(s).

Bunched Trading

We may engage in bunched trading, which is the purchase or sale of a security for the accounts of multiple clients in a single transaction. If a bunched trade is executed, each participating client receives a price that represents the average of the prices at which all of the transactions in a given bunch were executed. Executing a bunched trade allows transaction costs to be shared equally and on a pro rata basis among all of the participating clients. If the order is not completely filled, the securities purchased or sold are distributed among participating clients on a pro rata basis or in some other equitable manner.

Bunched trades are placed only when we reasonably believe that the combination of the transactions provides better prices for clients than had individual transactions been placed for clients. Transactions for nondiscretionary client accounts are not bunched with transactions for discretionary client accounts.

Transactions for the accounts of our employees and advisory representatives may be included in bunched trades. They receive the same average price and pay the same commissions and other transaction costs, as clients. Transactions for the accounts of our advisory representatives or employees will not be favored over transactions for client accounts.

We are not obligated to include any client account in a bunched trade. Bunched trades will not be placed for any client's account where prohibited or otherwise inconsistent with that client's investment advisory agreement. No client will be favored over any other client.

Item 13: Review of Accounts

All client accounts are monitored on an ongoing basis with a formal review conducted at least annually or as agreed upon with individual clients. The reviews focus on the consistency of portfolio investments with each client's stated objectives and risk tolerances. The reviews also consider:

- investment restrictions requested by individual clients,
- investment time horizons,
- liquidity needs,
- tax considerations, and
- other circumstances unique to each client.

Changes in your investments and your investment strategies will be made or recommended by us as they are deemed appropriate.

Account reviews may also be triggered by other factors such as changes in general economic and market conditions, analyst reports, issuer news and interest rate movement. Louis Tilchin, Managing Partner, and Scott Jaffe, Director of Investment Management, assign reviewers based upon their familiarity with your accounts. Typically, advisory representatives review their own client accounts.

You will receive statements from the custodian/broker-dealer at least quarterly. These statements identify your current investment holdings, the cost of each of those investments, and their current market values. You will also receive performance analysis reports prepared by us which describe the returns realized on the investments in your account.

Unaffiliated Asset Management Services

Our advisory representatives will regularly review the reports provided to you by any third-party investment managers that are managing assets for you. We will contact you at least annually (or more often as agreed upon with you) to review your financial situation, investment goals and objectives and risk tolerances, and the performance of the third-party investment manager to help monitor that your account is being managed in a manner consistent with your objectives.

Again, we strongly encourage you to advise us of any changes in your personal circumstances, your investment goals or objectives, and your risk tolerances to help ensure that your investments and investment strategies are appropriate for you.

You will receive statements on at least a quarterly basis from the custodian holding your

account. These statements will identify your current investment holdings, the cost of each of those investments, and their current market values.

Item 14: Client Referrals and Other Compensation

We may enter into written agreements with certain unaffiliated investment advisers and other professionals (such as CPAs, attorneys, etc.) to compensate them for referring clients to us. We will pay these individuals (referred to as “solicitors”) a percentage of the advisory fee that you pay us if it is determined that you have become a client of ours as a result of their direct or indirect efforts.

The payments we make to a solicitor will not result in an increase in the amount of the advisory fee that the referred client will pay.

Our solicitation or referral arrangements will comply with applicable laws that govern:

- the nature of the services provided;
- the fees to be paid;
- disclosure of solicitor arrangements to clients; and
- client consents, as required.

We receive certain economic benefits as a result of our participation in a Custodian’s institutional program. Those benefits are described in detail in the preceding section entitled “Brokerage Practices.”

Item 15: Custody

Your assets are maintained with a qualified custodian. We do not have physical custody of your assets but may be deemed to have custody when you authorize us to deduct our fees from your account. You will receive statements from the custodian/broker-dealer that holds your investment account on at least a quarterly basis. We urge you to carefully review these statements and compare them to the account statements that we may provide you. You should verify that the transactions in your account are consistent with your investment goals and the objectives for your account. We also encourage you to contact your advisory representative or our Chief Compliance Officer should you have any questions or concerns regarding your account.

Item 16: Investment Discretion

We offer our advisory services on a discretionary basis. This means that we do not need advance approval from you to determine the type and amount of securities to be bought and sold for your accounts. We do not, however, have the ability to choose the broker-dealer through which transactions will be executed. Additionally, we do not have the

ability to withdraw funds from your account (other than to withdraw our advisory fees which, may only be done with your prior written authorization.)

This discretion is used in a manner consistent with the stated investment objectives for your account, if you have given us written authorization to do so. We only exercise discretion in accounts where we have been authorized by you. This authorization is typically included in the investment advisory agreement you enter into with us.

Typically under third-party investment management arrangements, the third-party investment manager exercises discretion in the management of your account. All securities transactions are selected and executed by that manager. We do not manage or obtain discretionary authority over the assets in those accounts. You may, however, grant us the discretionary authority to hire and fire such third-party managers on your behalf.

Item 17: Voting Client Securities

We have contracted with Broadridge for use of its ProxyEdge® ballot voting service in order to manage and facilitate proxy voting for you. Broadridge is an independent firm and not affiliated with us. All proxy voting has been delegated and is to be conducted on an automated basis through ProxyEdge®, which will include and not be limited to mergers, acquisitions, tender offers, bankruptcy proceedings or other events pertaining to your investment assets.

You may request a copy of your securities voting history and our Proxy Voting Policies and Procedures at any time and in any frequency by notifying us in writing of such request and mailing the request to the address indicated on the front page of this brochure.

Item 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you and we have not been the subject of a bankruptcy proceeding.



***Jaffe Tilchin Investment Partners,
LLC.***

15350 N. Florida Avenue

Tampa, FL 33613

813.963.2500

www.jaffetilchin.com

Louis Tilchin

Form ADV Part 2B Brochure Supplement

March 25, 2022

This brochure supplement provides information about Louis Tilchin that supplements the Jaffe Tilchin Investment Partners, LLC brochure. You should have received a copy of that brochure. Please contact M. Scott Jones, Chief Compliance Officer, if you did not receive Jaffe Tilchin Investment Partners, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Louis Tilchin, CRD Number 1495823, is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience



Louis Tilchin

Year of birth: 1964

Formal education:

- ✦ Florida State University
BS Degree - Business Administration

Business background:

- ✦ Jaffe Tilchin Investment Partners, LLC (also doing business as Jaffe Tilchin Institutional Consulting and Jaffe Tilchin Wealth Management) (04/2007 to Present), Managing Partner & Investment Advisor Representative
- ✦ Jaffe Tilchin Wealth Management, (04/2007 to Present), Owner
- ✦ APW Capital, Inc. (04/2009 – 5/2020), Registered Representative
- ✦ J.W. Cole Financial, Inc. (09/2003 – 04/2009), Registered Representative
- ✦ Jonathan Roberts Advisory Group (01/2002 to 09/2003), Investment Advisor Representative

Disciplinary Information

Lou Tilchin has not been the subject of any criminal or regulatory action. As a registered representative of Pruco, Mr. Tilchin was previously named in three customer complaints and a suit in state court which were settled by Pruco. No finding or action has been entered against Mr. Tilchin. Additional information is available at www.brokercheck.finra.org.

Other Business Activities

Jaffe Tilchin Investment Partners, LLC is affiliated with Jaffe Tilchin Wealth Management and RCR Financial, through common ownership. Jaffe Tilchin Wealth Management and RCR Financial are insurance agencies and offer commissionable insurance products.

In addition, Mr. Tilchin is a licensed insurance producer offering insurance products and services through Jaffe Tilchin Wealth Management and RCR Financial. Mr. Tilchin receives commissions from insurance products purchased through both entities.

Mr. Tilchin is also a majority partner of Jaffe Tilchin Wealth Management and has been since the firm was founded. As such, Mr. Tilchin shares in the responsibilities of the firm and is entitled to customary benefits of ownership such as distributions of income or profit. As a majority partner he devotes the majority of his time each month to this business, which is located at 15350 N. Florida Ave., Tampa, FL 33613. Jaffe Tilchin Wealth Management provides investment and insurance services to individuals and businesses. We mitigate this conflict by disclosing it to our clients and potential clients.

Additional Compensation

Mr. Tilchin receives additional compensation for his activities as an insurance producer. This compensation is described under “Other Business Activities” above. Mr. Tilchin receives no additional compensation beyond the consulting fees charged for consulting services provided to qualified and non-qualified plans.

Supervision

Mr. Tilchin is supervised by M. Scott Jones, Chief Compliance Officer. Mr. Jones can be reached at 813.963.2500.

We supervise Mr. Tilchin by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics. We will monitor the advice that Mr. Tilchin gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established;
- A daily review of account transactions;
- Review custodial information on a quarterly basis to assess account activity;
- Perform annual oversight to ensure that Mr. Tilchin is aware of your current financial situation, objectives, and individual investment needs; and
- A review of client correspondence on an as needed basis.

Jaffe Tilchin Investment Partners, LLC.

15350 N. Florida Avenue

Tampa, FL 33613

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www.jaffetilchin.com

Scott Jaffe

Form ADV Part 2B Brochure Supplement

March 25, 2022

This brochure supplement provides information about Scott Jaffe that supplements the Jaffe Tilchin Investment Partners, LLC brochure. You should have received a copy of that brochure. Please contact M. Scott Jones, Chief Compliance Officer, if you did not receive Jaffe Tilchin Investment Partners, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Scott Jaffe, CRD Number 1536635, is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience



Scott Jaffe

Year of birth: 1960

Formal education:

- ✦ Indiana University
BS Degree - Finance
- ✦ Penn State University
Master of Business Administration

Business background:

- ✦ Jaffe Tilchin Investment Partners, LLC (also doing business as Jaffe Tilchin Institutional Consulting and Jaffe Tilchin Wealth Management) (04/2007 to Present), Director of Investment Management & Investment Advisor Representative
- ✦ Jaffe Tilchin Wealth Management, (04/2007 to Present), Owner
- ✦ APW Capital, Inc. (04/2009 – 12/2021), Registered Representative
- ✦ J.W. Cole Financial, Inc. (04/2007 – 04/2009), Registered Representative
- ✦ Citigroup Global Markets, Inc. (02/1997 – 04/2007), Registered Representative
- ✦ Salomon Smith Barney, Inc. (02/1997 to 04/2007), Senior Portfolio Manager

Disciplinary Information

Scott Jaffe has not been the subject of any civil, criminal or regulatory action or disciplinary event. Mr. Jaffe has been named in one customer complaint which was settled. No finding or action has been entered against Mr. Jaffe.

Additional information is available at <https://brokercheck.finra.org>.

Other Business Activities

Jaffe Tilchin Investment Partners, LLC is affiliated with Jaffe Tilchin Wealth Management, through common ownership. Jaffe Tilchin Wealth Management is an insurance agency and offers commissionable insurance products.

In addition to his association with Jaffe Tilchin, Mr. Jaffe is a registered representative of APW Capital, Inc., a registered broker/dealer.

As a registered representative of a broker-dealer, Mr. Jaffe may receive commissions or other compensation from the sale of insurance and securities products to you. If you choose to implement your financial plan through APW Capital, Inc., Mr. Jaffe can receive compensation in addition to sharing in the advisory fees you pay. This additional compensation may present a conflict of interest because it creates an incentive to recommend certain insurance and securities over others that may not offer similar compensation. You are not required to do business with Mr. Jaffe in any of these capacities

Mr. Jaffe is also a majority partner of Jaffe Tilchin Wealth Management and has been since the firm was founded. As such, Mr. Jaffe shares in the responsibilities of the firm and is entitled to customary benefits of ownership such as distributions of income or profit. As a majority partner he devotes the majority of his time each month to this business, which is located at 15350 N. Florida Ave., Tampa, FL 33613. Jaffe Tilchin Wealth Management provides investment and insurance services to individuals and businesses. We mitigate this conflict by disclosing it to our clients and potential clients.

Additional Compensation

Mr. Jaffe receives additional compensation for his activities as a registered representative of a broker-dealer. This compensation is described under “Other Business Activities” above. Mr. Jaffe receives no additional compensation beyond the consulting fees charged for consulting services provided to qualified and non-qualified plans.

Supervision

Mr. Jaffe is supervised by M. Scott Jones, Chief Compliance Officer. Mr. Jones can be reached at 813.963.2500.

We supervise Mr. Jaffe by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics. We will monitor the advice that Mr. Jaffe gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established;
- A daily review of account transactions;
- Review custodial information on a quarterly basis to assess account activity;
- Perform annual oversight to ensure that Mr. Jaffe is aware of your current financial situation, objectives, and individual investment needs; and
- A review of client correspondence on an as needed basis.

***Jaffe Tilchin Investment Partners,
LLC.***

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M. Scott Jones, CLU

Form ADV Part 2B Brochure Supplement

March 25,2022

This brochure supplement provides information about M. Scott Jones that supplements the Jaffe Tilchin Investment Partners, LLC brochure. You should have received a copy of that brochure. Please contact M. Scott Jones, Chief Compliance Officer, if you did not receive Jaffe Tilchin Investment Partners, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about M. Scott Jones, CRD Number 1364944, is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience



M. Scott Jones, CLU

Year of birth: 1960

Formal education:

- ✦ Florida State University
BS Degree – Risk Management & Insurance

Business background:

- ✦ Jaffe Tilchin Investment Partners, LLC (also doing business as Jaffe Tilchin Institutional Consulting and Jaffe Tilchin Wealth Management) (04/2007 to Present), Chief Compliance Officer & Investment Advisor Representative
- ✦ APW Capital, Inc. (04/2009 – Present), Registered Representative
- ✦ J.W. Cole Financial, Inc. (09/2003 – 04/2009), Registered Representative
- ✦ Jonathan Roberts Advisory Group; (01/2002 12/07), Investment Advisor Representative

Professional Designations:

The Chartered Life Underwriter® (CLU) designation is a professional credential for persons providing advisory services related to risk management.

The CLU® designation is awarded by The American College after successful completion of eight college-level courses, generally requiring 400 hours of study and examinations for each course. Designees must meet experience and continuing education requirements and must adhere to a high ethical standard.

Disciplinary Information

M. Scott Jones has not been the subject of any legal or disciplinary event.

Other Business Activities

In addition to his association with Jaffe Tilchin, Mr. Jones is a registered representative of APW Capital, Inc., a registered broker/dealer. He is also a licensed insurance agent offering insurance products and services through unaffiliated insurance companies.

As a licensed insurance agent and a registered representative of a broker-dealer, Mr. Jones may receive commissions or other compensation from the sale of insurance and securities products to you. If you choose to implement your financial plan through APW Capital, Inc., Mr. Jones may receive compensation in addition to sharing in the advisory fees you pay. This additional compensation presents a potential conflict of interest because it creates an incentive to recommend certain insurance and securities products over others that may not offer similar compensation. You are not required to do business with Mr. Jones in any of these capacities.

Mr. Jones is also a minority partner of Jaffe Tilchin Wealth Management, and has been since 4/1/18. As such, Mr. Jones shares in the responsibilities of the firm and is entitled to customary benefits of ownership such as distributions of income or profit. As a minority partner he devotes less than five hours per month to this business, which is located at 15350 N. Florida Ave., Tampa, FL 33613. Jaffe Tilchin Wealth Management provides investment and insurance services to individuals and businesses. We mitigate this conflict by disclosing it to our clients and potential clients

Additional Compensation

Mr. Jones receives additional compensation for his activities as a registered representative of a broker-dealer and as an insurance agent. This compensation is described under “Other Business Activities” above. Mr. Jones receives no additional compensation beyond the consulting fees charged for consulting services provided to qualified and non-qualified plans.

Supervision

Mr. Jones is supervised by Louis Tilchin, Managing Partner. Mr. Tilchin can be reached at 813.963.2500.

We supervise Mr. Jones by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics. We will monitor the advice that Mr. Jones gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established;
- A daily review of account transactions;
- Review custodial information on a quarterly basis to assess account activity;
- Perform annual oversight to ensure that Mr. Jones is aware of your current financial situation, objectives, and individual investment needs; and
- A review of client correspondence on an as needed basis.