



## **True Wealth & Company LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 15, 2023**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of True Wealth & Company LLC (“True Wealth” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at 913-653-8783.

True Wealth is a registered investment advisor with the U.S. Securities and Exchange Commission. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”)/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 about True Wealth to assist you in determining whether to retain the Advisor.

Additional information about True Wealth and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 174841.

**True Wealth & Company LLC**  
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**<https://retirewithtrue.com/>**

## Item 2 – Material Changes

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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 the Advisory Persons of True Wealth. For convenience, the Advisor has combined these documents into a single disclosure document.

True Wealth 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. True Wealth encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

### 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.

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](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 174841. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at 913-653-8783.

### Item 3 – Table of Contents

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<b>Item 1 – Cover Page</b>	<b>1</b>
<b>Item 2 – Material Changes</b>	<b>2</b>
<b>Item 3 – Table of Contents</b>	<b>3</b>
<b>Item 4 – Advisory Services</b>	<b>4</b>
A. Firm Information	4
B. Advisory Services Offered	4
C. Client Account Management	6
D. Wrap Fee Programs	6
E. Assets Under Management	6
<b>Item 5 – Fees and Compensation</b>	<b>6</b>
A. Fees for Advisory Services	6
B. Fee Billing	7
C. Other Fees and Expenses	8
D. Advance Payment of Fees and Termination	8
E. Compensation for Sales of Securities	9
<b>Item 6 – Performance-Based Fees and Side-By-Side Management</b>	<b>9</b>
<b>Item 7 – Types of Clients</b>	<b>9</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss</b>	<b>9</b>
A. Methods of Analysis	9
B. Risk of Loss	10
<b>Item 9 – Disciplinary Information</b>	<b>12</b>
<b>Item 10 – Other Financial Industry Activities and Affiliations</b>	<b>12</b>
<b>Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b>	<b>12</b>
A. Code of Ethics	13
B. Personal Trading with Material Interest	13
C. Personal Trading in Same Securities as Clients	13
D. Personal Trading at Same Time as Client	13
<b>Item 12 – Brokerage Practices</b>	<b>13</b>
A. Recommendation of Custodian[s]	13
B. Aggregating and Allocating Trades	14
<b>Item 13 – Review of Accounts</b>	<b>14</b>
A. Frequency of Reviews	14
B. Causes for Reviews	14
C. Review Reports	14
<b>Item 14 – Client Referrals and Other Compensation</b>	<b>15</b>
A. Compensation Received by True Wealth	15
B. Compensation for Client Referrals	15
<b>Item 15 – Custody</b>	<b>15</b>
<b>Item 16 – Investment Discretion</b>	<b>16</b>
<b>Item 17 – Voting Client Securities</b>	<b>16</b>
<b>Item 18 – Financial Information</b>	<b>16</b>
<b>Privacy Policy</b>	<b>29</b>

## Item 4 – Advisory Services

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### A. Firm Information

True Wealth & Company LLC (“True Wealth” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission. The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the State of Kansas. True Wealth was founded in 2012 and is owned and operated by Bryan Sarff and Kenneth Burkhead III. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by True Wealth.

### B. Advisory Services Offered

True Wealth offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses, retirement plans, charitable organizations, corporations, and other business entities (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. True Wealth’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.

#### Investment Management Services

True Wealth provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. True Wealth works closely 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. True Wealth will then construct an investment portfolio, consisting diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds, options contracts, structured notes to meet the needs of its Clients. The Advisor may retain certain types of investments based on a Client’s legacy investments based on portfolio fit and/or tax considerations.

True Wealth’s investment strategies are 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. True Wealth 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.

True Wealth evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. True Wealth may recommend, on occasion, redistributing investment allocations to diversify the portfolio. True Wealth 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.

True Wealth 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.

True Wealth will provide investment management services and related services. True Wealth accepts custody of a Client’s funds or securities, through the deduction of management fees from the Client’s account[s] at the Custodian, and in certain situations where a Supervised Person of True Wealth may have access to a Client’s held-away account login credentials.

*Retirement Accounts* – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client’s best interest, the Advisor will

provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

*Participant Account Management:* True Wealth offers qualified plan consulting services to individuals for a fee based on included assets in their plan described in detail under “Fees and Compensation” section of this brochure. True Wealth meet with the client for information gathering. True Wealth meets with the client at least annually or on an as needed basis determined by the client to review the investment options available within the plan. True Wealth will make investment recommendations to the client based on the investment options available and the client’s financial objectives in a meeting with the client.

### Financial Planning Services

True Wealth will typically provide a variety of financial planning and consulting services to Clients, 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 involve preparing a formal financial plan or rendering a specific financial consultation based on the Client’s financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, business retirement planning, education savings, insurance needs and other areas of a Client’s financial situation.

A financial plan developed for, or financial consultation rendered to 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.

True Wealth may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client’s financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations 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 or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. 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 through the Advisor.

### Retirement Plan Advisory Services

True Wealth may provide the following retirement plan advisory services:

- Employee Enrollment and Education Tracking
- Investment Policy Statement (“IPS”) Support
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance

True Wealth may provide investment advisory services on behalf of the Plan and Plan Sponsor, which may be in either a 3(21) or 3(38) context depending on whether or not the Advisor is also providing discretionary investment management over the Plan assets. For 3(38) services, the Advisor shall have the discretion to select the investments for the Plan and/or make investment decisions on behalf of Plan Participants.

### Business Consulting

We provide business consulting services to small business owners which includes wealth planning through us and Professional Employer Organizations ("PEO") through an affiliate, myTrueHR, LLC. We also coordinate with other professionals for Accounting, Tax Planning, Legal Services, Commercial Banking and Insurance.

### Seminars and Workshops

True Wealth holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given. True Wealth does not charge a fee for attendance of these seminars.

### Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objectives of each client. Clients may impose restrictions on investing in certain securities or types of securities, subject to True Wealth agreement. Agreements may not be assigned without client consent.

## **C. Client Account Management**

Prior to engaging True Wealth 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 may include:

- Establishing an Investment Strategy – True Wealth, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – True Wealth 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 – True Wealth will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – True Wealth will provide investment management and ongoing oversight of the Client's investment portfolio.

## **D. Wrap Fee Programs**

True Wealth does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by True Wealth.

## **E. Assets Under Management**

As of December 31, 2022, True Wealth manages \$126,496,448 in Client assets, \$122,072,201 of which are managed on a discretionary basis and \$4,424,247 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

### **A. Fees for Advisory Services**

#### Investment Management Services

Investment advisory fees are paid quarterly or monthly in arrears or in advance pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar month. Investment advisory fees are based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
\$0 to \$2,000,000	1.20%
\$2,000,001 to \$4,000,000	1.10%
\$4,000,001 to \$6,000,000	1.00%
\$6,000,001 to \$8,000,000	0.90%
\$8,000,001 to \$10,000,000	0.80%
\$10,000,001 to >10,000,001	0.60%

The investment advisory fee in the first billing period of service is prorated from the inception date of the account[s] to the end of the first billing period. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by True Wealth will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuation to ensure accurate billing.

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.

#### Financial Planning Services

True Wealth offers financial planning services either on an hourly basis or a fixed engagement fee. Hourly fees are \$150 per hour. Fixed fees range from \$500 to \$5,000. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services.

#### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 1%, billed quarterly or monthly pursuant to the terms of the agreement. Retirement plan fees are based on the market value of assets under management at the end of the prior calendar quarter or month. Fees range are generally based on the following schedule:

<b>Assets Under Management</b>	<b>Annual Rate</b>
\$0 to \$4,000,000	1.00%
\$4,000,001 to \$8,000,000	0.90%
\$8,000,001 to \$12,000,000	0.80%
\$12,000,001 to \$16,000,000	0.70%
\$16,000,001 to \$20,000,000	0.60%
\$20,000,001 to \$24,000,000	0.50%
\$24,000,001 and greater	Negotiated

## **B. Fee Billing**

#### Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective end date. The amount due is calculated by applying the annual rate divided by the number of days in the year multiplied by the number of days in the month multiplied by the total assets under management with True Wealth at the end of each month. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. Clients are urged to also review and compare the statement provided by the Advisor to the brokerage statement from the Custodian, as the Custodian does not perform a verification of fees. Clients provide written authorization permitting advisory fees to be deducted by True Wealth to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.



#### Financial Planning Services

Financial planning fees may be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced either monthly or quarterly upon completion of the agreed upon deliverable[s].

#### Retirement Plan Advisory Services Fees

True Wealth is compensated for its services at the end of the month after advisory services are rendered. Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than True Wealth, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's recommended Custodian does 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 Custodian typically charges for mutual funds and other types of investments. The fees charged by True Wealth are separate and distinct from these custody and execution fees.

In addition, all fees paid to True Wealth 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 True Wealth, but would not receive the services provided by True Wealth 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 True Wealth 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**

#### Investment Management Services

True Wealth may be compensated for its investment management services at the end of the month after services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's 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. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

#### Financial Planning Services

True Wealth is compensated for its financial planning services either monthly, quarterly or upon completion of the engagement deliverable[s]. True Wealth may require an advance deposit as described above. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's 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 or in the case of a fixed fee engagement, the percentage of the engagement scope completed by the Advisor. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

#### Retirement Plan Advisory Services Fees

Either party may request to terminate their services with True Wealth in whole or in part, by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the



effective date of termination. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's written approval.

#### **E. Compensation for Sales of Securities**

True Wealth does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Certain Advisory Persons are also licensed as independent insurance professionals. We have created your wealth management plan and understand your complete financial situation as best as we possibly can. We see a benefit to you as the client working with us to evaluate and determine the insurance you may or may not need, rather than referring you to another professional who may or may not understand your wealth management plan as well as we do. As an independent insurance professional, the Advisory Person may earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because the person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any Advisory Person affiliated with the Advisor.

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

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

True Wealth 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**

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True Wealth offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses, retirement plans, charitable organizations, corporations, and other business entities.

True Wealth generally does not impose a minimum relationship size. However, the Advisor does have a minimum negotiable monthly fee for services of \$400/month. In addition, the Advisor also requires a negotiated down payment prior to beginning of the Financial Planning services which does not exceed \$5,000, six months in advance.

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

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##### **A. Methods of Analysis**

True Wealth primarily employs a fundamental, technical, cyclical, behavioral and charting analysis methods in developing investment strategies for its Clients. Research and analysis from True Wealth 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. This criteria consists generally of 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.

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*Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that True Wealth will be able to accurately predict such a reoccurrence.

*Cyclical analysis* is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that True Wealth is recommending. The risks with cyclical analysis are similar to those of technical analysis.

*Behavioral finance analysis* involves an examination of conventional economics as well as behavioral and cognitive psychological factors. Behavioral finance methodology seeks to combine a qualitative and quantitative approach to provide explanations for why individuals may, at times, make irrational financial decisions. Where conventional financial theories have failed to explain certain patterns, the behavioral finance methodology investigates the underlying reasons and biases that cause some people to behave against their best interests. The risks relating to behavior finance analysis are that it relies on spotting trends in human behavior that may not predict future trends.

*Charting analysis* utilizes various market indicators as investment selection criteria. These criteria are generally pricing trends that may indicate movement in the markets. 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 technical and charting analysis may lose value and may have negative investment performance. The Advisor monitors these market indicators to determine if adjustments to strategic allocations are appropriate.

As noted above, True Wealth generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. True Wealth may 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, True Wealth 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 may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. True Wealth 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. Please see Item 8.B. for risks associated with the Advisor's investment strategies as well as general risks of investing.

While the methods of analysis help 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 these methods of 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.

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.

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 strategies:

#### 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 has 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.

#### Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

#### 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.

#### Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

#### Concentrated Portfolios

Concentrated portfolios are an aggressive and highly volatile approach to trading and investing and should be viewed as complementary to a stable, highly predictable investment approach. Concentrated portfolios hold fewer different stocks than a diversified portfolio and are much more likely to experience sudden dramatic price swings. In

addition, the rise or drop in price of any given holding in the portfolio is likely to have a larger impact on portfolio performance, than a more broadly diversified portfolio.

#### 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.

#### Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. For Example, equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

#### Oil and Gas Interests

Investing in oil and gas interests whether directly or as part of a fund/ETF involves distinct risks. The price of oil and gas interests may fluctuate to a greater degree than other securities and contain additional risks based on the supply and demand for oil and gas. Some of these additional risks include, the ability to obtain reliable oil and gas supply, oil and gas reserve estimates, the ability to locate markets for oil and gas, fluctuations in prices. The values of oil and gas interests are subject to market risk by a range of variables that could cause trends to differ materially.

#### Interval Mutual Funds / Liquidity Risk

Clients invested in an interval mutual funds should be aware of the illiquidity of holding such a mutual fund. Liquidity for fund shares is generally provided through a repurchase offer with a frequency disclosed in the fund's prospectus. An example of such a repurchase offer might be 5% of the fund's shares on a quarterly basis. This agreement does not guarantee that a Client will be able to sell all the shares that the Client desires to sell in the offer. There is currently no secondary market for the shares of these funds.

**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**

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**There are no legal, regulatory or disciplinary events involving True Wealth or its owner [OR] management persons.** True Wealth 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 or Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 174841.

### **Item 10 – Other Financial Industry Activities and Affiliations**

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#### Insurance Agency Affiliations

As noted in Item 5, certain Advisory Persons are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with True Wealth. As an insurance professional, the Advisory Person may receive customary commissions and other related revenues from the various insurance companies whose products are sold. the Advisory Person is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Advisor.

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

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True Wealth & Company LLC  
7450 W 130th Street, Suite 300, Overland Park, KS 66213  
Phone: 913-653-8783 \* Fax: 913-333-3909  
<https://retirewithtrue.com/>

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## **A. Code of Ethics**

True Wealth 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 True Wealth ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. True Wealth and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of True Wealth's Supervised Persons 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 913-653-8783.

## **B. Personal Trading with Material Interest**

True Wealth allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. True Wealth 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. True Wealth does not have a material interest in any securities traded in Client accounts.

## **C. Personal Trading in Same Securities as Clients**

True Wealth 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 the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. 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 True Wealth requires reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate/OR by conducting a coordinated review of personal accounts and the accounts of the Clients. 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 True Wealth 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 aggregated with Client orders or traded afterwards. **At no time will True Wealth, or any Supervised Person of True Wealth, transact in any security to the detriment of any Client.**

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## **Item 12 – Brokerage Practices**

### **A. Recommendation of Custodian[s]**

True Wealth 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 True Wealth to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, True Wealth does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where True Wealth does not exercise discretion over the selection of the Custodian, it may recommend the Custodian 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 True Wealth. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. True Wealth may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.



The Advisor typically recommends that Clients establish accounts with TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under 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. **True Wealth does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - True Wealth does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where True Wealth 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]). True Wealth 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. True Wealth will execute its transactions through the Custodian as authorized by the Client. True Wealth may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Kenneth Burkhead, Chief Financial Officer of True Wealth. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client and coordinated with their advisory team at True Wealth.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., 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 True Wealth 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**

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### **A. Compensation Received by True Wealth**

True Wealth is a fee-based advisory firm, that is compensated solely by its Clients and not from any investment product. True Wealth does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. True Wealth may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, True Wealth may receive non-compensated referrals of new Clients from various third-parties.

#### Participation in Institutional Advisor Platform

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 potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

### **B. Compensation for Client Referrals**

True Wealth does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

## **Item 15 – Custody**

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All Clients must maintain their accounts with a "qualified custodian" as described in item 12. True Wealth accepts custody of a Clients funds or securities, through the deduction of management fees from the Client's account[s] at the Custodian, and in certain situations where a Supervised Person of True Wealth may have access to a Client's held-away account login credentials.

Clients will receive account statements at least quarterly and generally monthly from the Custodian. You are urged to compare the Custodian account statements against statements prepared by True Wealth for accuracy. Minor variations may occur because of reporting dates, accrual methods of interest and dividends, and other factors. The custody statement is the official record of your account for tax purposes. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

#### Surprise Independent Examination

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**True Wealth & Company LLC**  
7450 W 130th Street, Suite 300, Overland Park, KS 66213  
Phone: 913-653-8783 \* Fax: 913-333-3909  
<https://retirewithtrue.com/>



As True Wealth is deemed to have custody over certain Client accounts and/or securities as part of their access to Client login credentials, pursuant to securities regulations the Advisor is required to engage an independent accounting firm to perform an annual surprise examination of those assets and accounts over which True Wealth maintains custody. Any related opinions issued by an independent accounting firm are filed with the SEC and are publicly available on the SEC's Investment Adviser Public Disclosure website (<http://adviserinfo.sec.gov>).

In addition, 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**

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True Wealth 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 True Wealth. 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 an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by True Wealth will be in accordance with each Client's investment objectives and goals.

#### **Item 17 – Voting Client Securities**

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True Wealth 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**

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Neither True Wealth, nor its management, have any adverse financial situations that would reasonably impair the ability of True Wealth to meet all obligations to its Clients. Neither True Wealth, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. True Wealth 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.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Bryan A. Sarff, CFP®**  
**Founder & Chief Executive Officer**

**Effective: March 15, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Bryan A. Sarff, CFP® (CRD# 4718059) in addition to the information contained in the True Wealth & Company LLC (“True Wealth” or the “Advisor”, CRD# 174841) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the True Wealth Disclosure Brochure or this Brochure Supplement, please contact us at 913-653-8783.

Additional information about Mr. Sarff is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4718059.

## Item 2 – Educational Background and Business Experience

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Bryan A. Sarff, CFP®, born in 1970, is dedicated to advising Clients of True Wealth as the Founder & Chief Executive Officer. Mr. Sarff earned a Bachelor's Degree in Marketing from University of Missouri Trulaske College of Business in 1994. Additional information regarding Mr. Sarff's employment history is included below.

### Employment History:

Founder & Chief Executive Officer, True Wealth & Company LLC	08/2012 to Present
Co-Founder & Director, myTrueHR LLC	09/2020 to Present

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP®, and federally registered CFP® (with flame design) 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 87,000 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;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination 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®.

## Item 3 – Disciplinary Information

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**There are no legal, civil or disciplinary events to disclose regarding Mr. Sarff.** Mr. Sarff 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. Sarff.

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. Sarff.***

However, we do encourage you to independently view the background of Mr. Sarff on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4718059.

#### **Item 4 – Other Business Activities**

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##### Insurance Agency Affiliations

Mr. Sarff is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Sarff's role with True Wealth. As an insurance professional, Mr. Sarff will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Sarff is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Sarff or the Advisor. Mr. Sarff spends approximately 4 hours of his time per month in this capacity.

##### Cofounder and Director

Mr. Sarff also serves as the Co-Founder and Director of myTrueHR LLC. As the Director, Mr. Sarff is responsible for activities associated with HR consulting, payroll services, and employer benefits administration. Mr. Sarff spends approximately 50 hours of his time per month in this capacity.

##### Board Member

Mr. Sarff also serves as a Board Member for a Non-Profit, Band of Angels. Mr. Sarff spends approximately 2 hours of his time per month in this capacity.

##### Owner

Mr. Sarff also is the owner of 2 Doors LLC. Mr. Sarff spends approximately 1 hour per month in this capacity.

#### **Item 5 – Additional Compensation**

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

#### **Item 6 – Supervision**

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Mr. Sarff serves as the Founder & Chief Executive Officer of True Wealth. Mr. Sarff can be reached at 913-653-8783.

True Wealth has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of True Wealth. Further, True Wealth is subject to regulatory oversight by various agencies. These agencies require registration by True Wealth and its Supervised Persons. As a registered entity, True Wealth is subject to examinations by regulators, which may be announced or unannounced. True Wealth 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**

**Kenneth E. Burkhead  
CFO and Personal Wealth Manager**

**Effective: March 15, 2023**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Kenneth E. Burkhead (CRD# 6426699) in addition to the information contained in the True Wealth & Company LLC ("True Wealth" or the "Advisor", CRD# 174841) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the True Wealth Disclosure Brochure or this Brochure Supplement, please contact us at 913-653-8783.

Additional information about Mr. Burkhead is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6426699.

## Item 2 – Educational Background and Business Experience

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Kenneth E. Burkhead, born in 1987, is dedicated to advising Clients of True Wealth as the Chief Financial Officer and Personal Wealth Manager. Mr. Burkhead earned a Bachelor's Degree in Finance from Emporia State University in 2010. Mr. Burkhead also earned an Associate's Degree in Business from Barton Country Community College in 2008. Additional information regarding Mr. Burkhead's employment history is included below.

### Employment History:

Chief Financial Officer and Personal Wealth Manager, True Wealth & Company LLC	02/2014 to Present
Co-Founder and Director, myTrueHR, LLC	10/2021 to Present

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Burkhead.*** Mr. Burkhead 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. Burkhead.

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. Burkhead.***

However, we do encourage you to independently view the background of Mr. Burkhead on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6426699.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Burkhead is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Burkhead's role with True Wealth. As an insurance professional, Mr. Burkhead will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Burkhead is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Burkhead or the Advisor. Mr. Burkhead spends approximately 20 hours of his time per month in this capacity.

### Co-Founder and Director

Mr. Burkhead also serves as the Co-Founder and Director of myTrueHR, LLC. As the Director, Mr. Burkhead is responsible for activities associated with HR consulting, payroll services, and employer benefits administration. Mr. Burkhead spends approximately 50 hours of his time per month in this capacity.

## Item 5 – Additional Compensation

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

## Item 6 – Supervision

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Mr. Burkhead serves as the Chief Financial Officer and Personal Wealth Manager of True Wealth and is supervised by Bryan Sarff, the Chief Compliance Officer. Mr. Sarff can be reached at 913-653-8783.

True Wealth has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of True Wealth. Further, True Wealth is subject to regulatory

oversight by various agencies. These agencies require registration by True Wealth and its Supervised Persons. As a registered entity, True Wealth is subject to examinations by regulators, which may be announced or unannounced. True Wealth 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**

**Brian T. Paulsen  
Personal Wealth Manager and Chief Operating Officer**

**Effective: March 15, 2023**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Brian T. Paulsen (CRD# 6329272) in addition to the information contained in the True Wealth & Company LLC ("True Wealth" or the "Advisor", CRD# 174841) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the True Wealth Disclosure Brochure or this Brochure Supplement, please contact us at 913-653-8783.

Additional information about Mr. Paulsen is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6329272.

## Item 2 – Educational Background and Business Experience

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Brian T. Paulsen, born in 1972, is dedicated to advising Clients of True Wealth as a Personal Wealth Manager. Mr. Paulsen earned a Bachelor's Degree in Marketing from University of Missouri - Columbia in 1994. Additional information regarding Mr. Paulsen's employment history is included below.

### Employment History:

Personal Wealth Manager and Chief Operating Officer, True Wealth & Company LLC	02/2015 to Present
Owner, Paulsen Consulting, Inc.	02/2015 to Present

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Paulsen.*** Mr. Paulsen 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. Paulsen.

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. Paulsen.***

However, we do encourage you to independently view the background of Mr. Paulsen on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6329272.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Paulsen is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Paulsen's role with True Wealth. As an insurance professional, Mr. Paulsen will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Paulsen is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Paulsen or the Advisor. Mr. Paulsen spends approximately 10% of his time per month in this capacity.

### Owner

Mr. Paulsen also serves as the Owner of Paulsen Consulting, INC. Mr. Paulsen spends approximately 1 hour of his time per month in this capacity.

### Advisory Board Member HPad Inc.

Mr. Paulsen also serves on the Advisory Board of HPad Inc., providing guidance on the corporation's research, product development, and marketing activities as requested. Mr. Paulsen spends approximately 1 hour of his time per month in this capacity.

## Item 5 – Additional Compensation

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

## Item 6 – Supervision

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Mr. Paulsen serves as a Personal Wealth Manager and Chief Operating Officer of True Wealth and is supervised by Bryan Sarff, the Chief Compliance Officer. Mr. Sarff can be reached at 913-653-8783.

True Wealth has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of True Wealth. Further, True Wealth is subject to regulatory oversight by various agencies. These agencies require registration by True Wealth and its Supervised Persons. As a registered entity, True Wealth is subject to examinations by regulators, which may be announced or unannounced. True Wealth 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**

**Misael N. Herrera Granados  
Service Advisor**

**Effective: March 15, 2023**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Misael N. Herrera Granados (CRD# 7355431) in addition to the information contained in the True Wealth & Company LLC ("True Wealth" or the "Advisor", CRD# 174841) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the True Wealth Disclosure Brochure or this Brochure Supplement, please contact us at 913-653-8783.

Additional information about Mr. Herrera Granados is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7355431.

## Item 2 – Educational Background and Business Experience

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Misael N. Hererra Granados, born in 2022, is dedicated to advising Clients of True Wealth as a Service Advisor. Mr. Hererra Granados earned a Bachelor's Degree from Southern New Hampshire University in 2022. Mr. Hererra Granados also earned an Associate's Degree from Johnson County Community College in 2019. Additional information regarding Mr. Hererra Granados's employment history is included below.

### Employment History:

Service Advisor, True Wealth & Company LLC	07/2022 to Present
Marketing Assistant, Johnson County Clinical Trials	03/2020 to Present
Busser, Indian Hills Country Club	04/2019 to 06/2021
Nutrition Ambassador, Advent Medical Center	03/2019 to 05/2019
Lumber Associate & Cashier, Home Depot	05/2018 to 04/2019
Sales Associate, Victory Chrysler Dodge Jeep Ram	01/2018 to 05/2018
Customer Service Representative, J Luengo Insurance Advisors	10/2017 to 01/2018
Cashier, IKEA	10/2017 to 01/2018

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Hererra Granados.*** Mr. Hererra Granados 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. Hererra Granados.

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. Hererra Granados.***

However, we do encourage you to independently view the background of Mr. Hererra Granados on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7355431.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Hererra Granados is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Hererra Granados's role with True Wealth. As an insurance professional, Mr. Hererra Granados will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Hererra Granados is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Hererra Granados or the Advisor. Mr. Hererra Granados spends approximately 10% of his time per month in this capacity.

### Marketing Assistant

Mr. Hererra Granados is also a Marketing Assistant in Clinical Research for Johnson County Clinical Trials. As a Marketing Assistant, Mr. Hererra Granados produces online content and aid with outbound marketing activities and events. Mr. Hererra Granados spends approximately 80 hours per month of his time in this capacity.

## Item 5 – Additional Compensation

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Mr. Hererra Granados has additional business activities where compensation is received that are detailed in Item 4 above.

## **Item 6 – Supervision**

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Mr. Hererra Granados serves as a Service Advisor of True Wealth and is supervised by Bryan Sarff, the Chief Compliance Officer. Mr. Sarff can be reached at 913-653-8783.

True Wealth has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of True Wealth. Further, True Wealth is subject to regulatory oversight by various agencies. These agencies require registration by True Wealth and its Supervised Persons. As a registered entity, True Wealth is subject to examinations by regulators, which may be announced or unannounced. True Wealth 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

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Effective: March 15, 2023

### Our Commitment to You

True Wealth & Company LLC ("True Wealth" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (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. True Wealth (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.

True Wealth 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?

Driver's license number	Date of birth
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.



### 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?
<b>Servicing our Clients</b> 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
<b>Marketing Purposes</b> True Wealth 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 True Wealth or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> 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
<b>Information About Former Clients</b> True Wealth 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

### 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.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at 913-653-8783.