

FORM ADV PART 2A – FIRM BROCHURE

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This brochure provides information about the qualifications and business practices of Polaris Financial, LLC (Polaris). If you have any questions about the contents of this brochure, please contact us at support@partnerpf.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Polaris also is available on the SEC's website at www.adviserinfo.sec.gov. Please search our full firm name or our CRD# 281952.

Polaris is a registered investment advisor with the SEC. The information in this brochure has not been approved or verified by SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training.

Item 2 – Summary of Material Changes

This Item 2 summarizes specific materials changes that have occurred since our last annual update of our brochure, which was filed on October 27, 2022.

- The firm has updated its broker dealer and custodian information.

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Item 4 – Advisory Services

We take a goal-oriented approach to financial advice. We utilize quantitative and qualitative methods to determine client goals, age, risk tolerance, investment experience, time horizon, net worth, and investment preferences. The gathered information is utilized to recommend an appropriate financial strategy and model portfolio. Advisory services we provide may include:

- Investment Strategy
- Asset Allocation
- Risk Tolerance
- Financial Planning
- Life Event Planning
- Portfolio Rebalancing
- Fund Selection
- Cryptocurrencies
- Portfolio Monitoring

We may invest client assets according to one or more model portfolios developed by our team. We offer seven model portfolio series; each series is composed of portfolios with distinct objectives and risk tolerance levels. Risk tolerance levels include conservative, moderately conservative, moderate, and aggressive. We utilize a rules-based tactical asset allocation strategy for each model portfolio. We may buy, sell, or re-allocate positions based on market conditions. A tactical asset allocation strategy does not guarantee superior investment returns.

Our model portfolios are generally comprised of 5-12 exchange-traded funds (ETFs) or cryptocurrencies. Each ETF provides exposure to specific asset classes: domestic and international equities, fixed income securities, real estate investment trusts, and gold. Cryptocurrencies in which the model portfolios will invest include cryptocurrencies traded on exchanges. Below please find a list of each model portfolio series:

- Fixed Income
- Core
- Multi Asset Income
- Thematic
- Biblically Responsible
- Precious Metals
- Cryptocurrencies

Portfolios can be customized upon request or at an advisor's discretion, as applicable for the Client account. Custom portfolios may include a mix of mutual funds, ETFs, and/or separately managed accounts. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs for both our model and custom portfolios.

We offer investment management services for cryptocurrency accounts as part of our ongoing financial planning and investment management services. Polaris generally manages cryptocurrency accounts on a discretionary basis. In some instances, clients may use Polaris' services only for their cryptocurrency accounts and not for other investment accounts. In such cases, Polaris' fiduciary and other duties extend only to the cryptocurrency accounts managed by Polaris. For clients engaging in financial planning and investment management service, there is no separate fee for cryptocurrency management. Custodians, trading exchanges, and other third parties may charge fees for their services related to our management of cryptocurrencies.

All accounts are established in accordance with our wrap fee program, except for those accounts with an allocation to cryptocurrency. A wrap fee program is an investment program that bundles the cost for securities transaction fees in the overall investment advisory fee. You should consider that, depending on the amount of activity in your account and the value of custodial, trade execution, advisory, and other services that are provided under the arrangement, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately or by others. Please see Appendix 1 – Wrap Fee Program Brochure, which is included as part of this Brochure for more details. Clients participating in cryptocurrency management services may be charged additional fees outside of the wrap fee program; including but not limited to: management fees, trading fees, and custody fees.

Advisory Services for Retirement Plans

We provide 3(38) advisory services on behalf of retirement plans and the Plan sponsors. As a 3(38) Investment Fiduciary, we are responsible for the selection, monitoring, and replacement of fund options for retirement plans. We work with Plan Sponsors to create an Investment Policy Statement (IPS) that details the methodology used to select Plan investment options and monitors and if necessary, replaces those investments. This includes:

- Assist in the preparation & maintenance of the IPS.
- Select Plan investment options.
- Establish & manage a Qualified Default Investment Alternative (QDIA)
- Avoid prohibited transactions and mitigate or eliminate conflicts of interest and disclose the same when appropriate.

As a 3(38) Investment Manager, we are only responsible for the investments we select and will not have any responsibility or liability regarding other investments offered by the Plan. Plan Sponsors may offer an option for Plan Participants to utilize self-directed brokerage accounts. We will not manage assets held in such Brokerage accounts. We will not advise Plan Participants on any aspect of a self-directed brokerage account.

These services are provided by serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of our fiduciary status, the specific services to be rendered and all direct and indirect compensation we reasonably expect under the engagement.

Assets Under Management

As of December 31st, 2022, we managed approximately \$24,005,067 in client assets, all of which are on a discretionary basis.

Item 5 – Fees & Compensation

Advisory Fees for Individuals

Clients pay a 1.5% annual fee billed monthly in arrears pursuant to the terms of the client investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of each calendar month. Fees may be negotiable at the sole discretion of the Advisor.

Advisory Fees for Retirement Plans

Plans pay a 0.50% annual fee billed quarterly in arrears pursuant to the terms of the Plan's 3(38) investment agreement. Investment advisory fees are based on the market value of assets under management at the end of each calendar month. Fees may be negotiable at the sole discretion of the Advisor.

We will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. We will send you an invoice showing the amount of the fee. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy. It is your responsibility to verify the accuracy of these fees as listed on the custodian's brokerage statement.

You may incur third-party fees or expenses in connection with our advisory services. All fees paid to us for advisory services are separate and distinct from the expenses charged by mutual funds, ETFs, and separately managed accounts. These fees and expenses are described in each fund's prospectus. These fees are generally composed of a management fee and other Fund expenses. Polaris does not earn nor receive a portion of such fees.

Clients should also be aware that transactions occurring on a blockchain typically require transaction fees from the exchange, custodian, or the blockchain itself. Some examples of on-blockchain transactions would include funding or withdrawing from a client's account in cryptocurrency or purchases and sales of cryptocurrencies. Such expenses will be paid directly from the Client's account to the recipient, as applicable. Polaris uses a third-party platform provider to execute cryptocurrency transactions and may use other cryptocurrency exchanges or other financial intermediaries for Client cryptocurrency transactions, who may charge fees for such transactions. Polaris does not earn nor receive a portion of any fees paid to a cryptocurrency exchange or financial intermediary.

For Clients in the Polaris Wrap Fee Program, all normal and customary securities and cryptocurrency transactions charges are included in the wrap fee. For more information on our Brokerage Practices please see Item 12 - Brokerage Practices and Appendix 1.

We do not charge fees in advance. Neither Polaris nor any of its supervised persons accept compensation for the sale of securities or other investment products.

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

Polaris does not charge performance-based fees for its investment advisory services.

Item 7 – Types of Client

We provide investment advisory services to individuals, families, and retirement plans. We have a \$500 (USD) minimum account size requirement. The minimum account size requirement is negotiable at our sole discretion.

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

Methods of Analysis

Polaris' investment analysis and research is grounded in tactical asset allocation and global diversification.

Tactical Asset Allocation (TAA) is an active management portfolio strategy. TAA utilizes a rules-based strategy that shifts the allocation of the portfolio based on quantitative factors and economic indicators. Quantitative factors and indicators include valuation and market momentum criteria. These criteria are derived from market data, third party research materials, and online research systems.

While TAA helps us evaluate and construct a portfolio it does not guarantee that the investment will increase in value. Assets may lose value and may have negative investment performance. We monitor these quantitative factors and indicators to determine if adjustments to allocations are appropriate. More details on our review process are included below in Item 13 – Review of Accounts. We generally employ a long-term investment strategy for you, as is consistent with your financial goals. We will typically hold a security for more than a year but may hold for shorter periods based on the TAA strategy. A TAA strategy does not guarantee superior investment returns to that of other investment strategies.

Polaris provides Clients with cryptocurrency investment recommendations based on each Client's interests, goals, financial situation, and risk tolerance. Such information is collected during the Client onboarding stage. Polaris will periodically review the available population of cryptocurrencies to identify the new assets and models that align with interests, goals, and risk tolerances of Polaris' clients. Before Polaris invests Client assets in a model portfolio provided by a third party, Polaris screens the model provider. The screening process is based on the availability of custodians, technology factors, and other considerations as Polaris deems appropriate.

The screening process may include evaluation of the company or team associated with the cryptocurrency, any publicly available materials on the assets or individuals involved in the cryptocurrency formation, and competitive advantages of the assets. Other criteria deemed important in the screening of assets offered through Polaris may be added to this list in the future as necessary to protect Clients.

Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. You should be prepared to bear the potential risk of loss. There is no guarantee that you will meet your investment goals. The following are some of the risks specific to our investment strategies.

TAA Risk

TAA may increase the risk of a portfolio. TAA engages in market timing which involves shifting allocations based on market conditions. This can result in frequent trading which may lead to a decrease in performance and/or increase in portfolio risk. TAA does not guarantee superior returns.

Market Risks

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

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

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.

Cryptocurrency Risks

The term “cryptocurrency” refers to an asset that is issued and/or transferred using distributed ledger or blockchain technology, including, but not limited to, so-called “virtual currencies,” “coins,” and “tokens.” The investment objective of our firm’s cryptocurrencies allocation is to offer interested clients exposure to the cryptocurrency market via a portfolio index comprised of a diversified basket of cryptocurrencies.

Cryptocurrencies represent a speculative investment and involve a high degree of risk. Supply is

determined by a computer code, not by a central bank, and prices can be extremely volatile. Cryptocurrency exchanges have been closed due to fraud, failure, security breaches, and legal noncompliance. Client assets held on an exchange that shuts down may be lost.

Several factors may affect the price of digital currencies and cryptocurrencies, including, but not limited to supply and demand, investors' expectations with respect to the rate of inflation, interest rates, currency exchange rates or future regulatory measures (if any) that restrict the trading of digital currencies/ cryptocurrencies or the use of cryptocurrencies as a form of payment. There is no assurance that cryptocurrencies will maintain their long-term value in terms of purchasing power in the future, or that acceptance of digital currency payments by mainstream retail merchants and commercial businesses will grow.

The prior performance of a cryptocurrency is not necessarily indicative of future results. Many cryptocurrencies have experienced high levels of performance and rapid increases in price, followed by significant downturns in performance and similarly rapid decreases in price.

Cryptocurrencies are created, issued, transmitted, and stored according to protocols run by computers in the cryptocurrency's network. It is possible these protocols have undiscovered flaws which could result in the loss of some or all Client assets. There may also be network scale attacks against these protocols that result in the loss of some or all Client assets. Some assets may be created, issued, or transmitted using experimental cryptography that could have underlying flaws. Advancements in quantum computing could break the cryptographic rules of protocols that may be negatively affected by technological advances that undermine the cryptographic consensus mechanism underpinning blockchain and distributed ledger protocols. Polaris makes no guarantees about the reliability of the cryptography used to create, issue, or transmit assets.

Certain cryptocurrencies may rely on or are built on a public or third-party blockchain, and the success of such blockchain may have a direct impact on the success of cryptocurrencies listed on the platform and recommended by Polaris. These cryptocurrencies are partly dependent on the effectiveness and success of such blockchains, as well as the success of other blockchain and decentralized data storage systems that are being used by the issuer of the cryptocurrencies. There is no guarantee that any of these systems or their sponsors will continue to exist or be successful. This could lead to disruptions of the operations of the issuer of the cryptocurrency listed on the platform and could negatively affect any cryptocurrency held by a Client from such issuer.

The cryptocurrency market presents significant risks that could negatively impact Polaris' ability to purchase and sell cryptocurrencies on a Client's behalf. For example, the cryptocurrency market frequently involves shallow trade volume, extreme hoarding, low liquidity, and high bankruptcy risk. Blocks of cryptocurrencies are often hoarded by a few owners or are kept out of circulation. Ownership concentration is high, which increases liquidity risk because large blocks of cryptocurrencies are difficult to sell in a timely and efficient manner.

An investment in cryptocurrencies is suitable only for clients wishing to have an allocation to an investment with a speculative objective who can bear the economic risk of the investment, who have no need for liquidity, understand the risks and are willing to accept those risks of loss of their entire investment in exchange for potential returns. Given the complexity of the products and technology that cryptocurrencies pose, investment decisions made with respect to the allocation of any portfolio to cryptocurrencies are subject to various potential risks including technical, legal, market, and operational risks, price volatility, illiquidity, valuation methodology, related-party transactions, and

conflicts of interest, and that those investment decisions will not always be profitable.

Government Regulation – Currently, cryptocurrencies are either unregulated or in the early stages of regulation by U.S. federal and state governments and self-regulatory organizations. As cryptocurrencies have grown in popularity, certain U.S. agencies, such as the SEC, the Financial Crimes Enforcement Network, and the Commodity Futures Trading Commission (“CFTC”), have begun to examine cryptocurrencies and their operations in depth. The SEC views a significant portion of cryptocurrencies as securities (using the investment contract definition) and has been involved in multiple enforcement actions, settlements, and federal court cases regarding the regulatory status of cryptocurrencies, their issuers, and intermediaries involved in the industry. The CFTC has declared that certain other cryptocurrencies are commodities and regulates those assets and in particular derivatives related to them. To the extent that any type of cryptocurrency is determined to be a security, commodity, or other regulated asset where Polaris has not anticipated that treatment, or to the extent that a U.S. or foreign government or quasi-governmental agency exerts additional regulatory authority over the cryptocurrencies, Polaris’ portfolios may be adversely affected. The effect of any future regulatory change on such assets is impossible to predict, but such change could be substantial and adverse.

Regulation of cryptocurrencies in the United States varies by state, and the regulations of certain states may limit the ability of Polaris to operate within those states. Certain states require persons to obtain a license to conduct a cryptocurrency business. Accordingly, Polaris does not intend to operate in states that require such licensing. If an individual is a resident of a state that requires such licensing, that individual will not be permitted to be a Client of Polaris. If Polaris were deemed to be conducting an unlicensed cryptocurrency business, it would be subject to significant additional regulation or regulatory consequences. Different state regulations could affect the transferability of cryptocurrency. To the extent that state regulations differ, certain cryptocurrencies may only be tradable in specific states. This could decrease the demand for and market for cryptocurrencies.

Risk of Loss - Investments in cryptocurrencies is highly speculative and involves a high degree of risk. Investments in cryptocurrencies are extremely volatile in nature and can have higher volatility than other traditional investors such as stocks and bonds, and market movements can be difficult to predict. The value of cryptocurrencies can change constantly and dramatically. If the value goes down, there’s no guarantee that it will rise again. Investors should be prepared for volatile market swings. As a result, there is a significant risk of loss of your entire principal investment. Investors should not be purchased by any person who cannot afford the loss of their entire investment. Due to the high price volatility, gains or losses are unpredictable and there can be no guarantee of returns. Transactions in cryptocurrencies may be irreversible, and, accordingly, losses due to fraudulent or accidental transactions may not be recoverable.

Limited investment history – Cryptocurrencies have only emerged as an investment opportunity in the past several years and are thus a relatively untested source of returns. It is unclear what the long-term profitability of cryptocurrencies will be, and their short history thus far is particularly unreliable for predicting future success.

No FDIC or SIPC Protection – Cryptocurrencies are not subject to Federal Deposit Insurance Corporation (“FDIC”) or Securities Investor Protection Corporation (“SIPC”) protections. Since

Polaris and its Custodian are not members of the FDIC or SIPC, Client assets are not subject to the protections enjoyed by depositors with FDIC or SIPC member institutions. While private insurance may be available at times, Client assets are not insured by Polaris.

Valuation Risk - Valuation of cryptocurrencies can differ significantly depending on the price source or otherwise due to factors such as market fragmentation, unregulated markets, illiquidity and volatility. There is no guarantee that a client will be able to achieve a better than average market price for cryptocurrencies or will purchase cryptocurrencies at the most favorable price available.

In addition to traditional market price risk factors such as inflation, interest rates, market and other political or economic events, the price of cryptocurrencies may be affected by a wide variety of additional complex factors including supply and demand as well as access to cryptocurrency service providers, exchanges, miners or and market participants.

Liquidity - Any liquidity may be limited or disrupted, and there can be no guarantees on the ability to sell or exchange cryptocurrencies at any price. It is also possible that regulatory agencies may then consider certain cryptocurrencies trading being conducted as unlawfully under interpretations of existing law and may take action at any time to freeze or stop cryptocurrencies from being released or traded.

Operational - Exchanges can stop operating due to security breaches, fraud, insolvency, market manipulation, market surveillance, KYC/AML procedures, non-compliance with applicable rules and regulations, technical glitches, hackers, malware, or other reasons; blockchain technology is a relatively new and untested technology which operates as a distributed ledger. Blockchain systems could be subject to internet connectivity disruptions, consensus failures or cybersecurity attacks, and the date or time that you initiate a transaction may be different than when it is recorded on the blockchain.

Custody Risk - Cryptocurrency holdings are not considered legal tender and are not insured by the government like U.S. bank deposits and therefore, you don't have the same protections as a bank account. Unlike most traditional currencies, such as the U.S. dollar, the value of a cryptocurrency is not tied to promises by a government or a central bank.

There is currently no regulation or standard auditing practice of accounts holding cryptocurrencies to verify ownership. There are counterparty and custody risks associated with cryptocurrencies including loss or theft of the asset. The organizations offering custody services for cryptocurrencies may be less liable or secure than more common custodians, which are generally banking institutions, due to their lack of regulatory experience. In general, cryptocurrencies cannot be held in custody by U.S. broker-dealers. Therefore, under the Advisers Act, as an SEC registered investment adviser, Polaris is required to use a "qualified custodian" that is suitably licensed to maintain client assets in separate accounts in Client's name. Theft is less likely when holding cryptocurrencies at a qualified custodian in offline systems (cold storage) with institutional security and controls.

Tax Risk – The tax characterization of cryptocurrencies is uncertain. The purchase of cryptocurrencies may result in adverse tax consequences to a Client, including withholding taxes, income taxes, and tax reporting requirements. Clients are encouraged to review IRS Notice 2014-

21 (the “Notice”) that sets forth published guidance from the U.S. Internal Revenue Service released in 2014 concerning the consequences of transacting in cryptocurrency. If a cryptocurrency is characterized as a “virtual currency” for income purposes, then, under the Notice, the general rules applicable to property transactions would apply.

Security Risk - Cryptocurrencies exist as computer-coded entries on a digital ledger, or blockchain, visible to and verifiable by nodes. Ownership is reflected in a string of numbers on a distributed ledger, accessible only by a public key and a private key in “wallets”.

To satisfy regulatory requirements, a custodian could hold a “private key” and a “public key” to the cryptocurrency. A custodian can maintain private keys in digital form on a computer hard drive unconnected from the internet and protected by layers of cybersecurity. Or the custodian can maintain and secure the private key in a “cold wallet” by, for example, locking it in a physical vault. In any event, the technology used for safeguarding cryptocurrencies is still emerging. Cryptocurrencies are essentially bearer assets. In general, anyone who obtains possession of the private key can, in theory, misappropriate the asset, no matter where the private key is maintained. The custodian may periodically store cryptocurrencies in “hot wallets” which are connected to the internet to facilitate transactions in. Cryptocurrencies stored in “hot wallets” may be more susceptible to theft or compromise than cryptocurrencies stored in other digital wallets. There can be no assurance the cryptocurrencies storage process will not be compromised.

Once a transaction has been verified and recorded in a block that is added to the blockchain, an incorrect transfer or theft of cryptocurrencies generally will not be reversible, and Polaris may not be able to seek compensation for any such transfer or theft. It is possible that, through computer or human error, or through theft or criminal action, Clients’ cryptocurrencies could be transferred in incorrect amounts or to unauthorized third parties. To the extent that Polaris is unable to seek a corrective transaction with such third party or is incapable of identifying the third party that has received the Client’s cryptocurrencies through error or theft, Polaris will be unable to revert or otherwise recover incorrectly transferred cryptocurrencies. To the extent that Polaris is unable to seek redress for such error or theft, such loss could adversely affect Clients’ investments.

To help mitigate this conflict of interest, our firm will only recommend that clients invest in a crypto portfolio when appropriate and if they are willing to accept the risks associated and require clients to sign a risk acknowledgment form prior to participating in the investment.

Crypto-exchanges and Other Service Providers – The institutions with which Polaris (directly or indirectly) does business, such as banks, cryptocurrency trading platforms, and other financial institutions, may encounter financial difficulties that impair Polaris’ operational capabilities. Polaris relies heavily on various service providers to perform many of the functions required to fulfill its investment objective, including the Custodian and digital trading platforms. Should any of these service providers experience financial, regulatory, or other difficulties that affect their operations, Polaris’ operational capabilities would be adversely affected. This is particularly acute considering the changing regulatory landscape for crypto currencies, which could affect the regulatory standing of service providers, and may cause them to change their business models or cease providing services Polaris depends on altogether. In particular, if the custodian or digital trading platform is no longer able to successfully provide services to Polaris, and an appropriate alternative is not immediately

available, this could have a negative impact on Polaris' investment management services.

The cryptocurrency exchanges are relatively new and may not be registered as brokers, exchanges, or alternative trading systems. They may therefore be out of compliance with federal or state law. In addition, these exchanges may be more exposed to theft, fraud, and failure than established, registered exchanges for other products. In general, cryptocurrency exchanges are currently start-up businesses with no institutional backing, limited operating history, and no publicly available financial information. Exchanges generally require cash to be deposited in advance to purchase cryptocurrencies, and no assurance can be given that those deposit funds can be recovered. Additionally, upon sale of cryptocurrencies, cash proceeds may not be received from the exchange for several business days. The participation in exchanges requires participants to take on credit risk by transferring cryptocurrencies from a participant's account to a third-party's account. Polaris takes on the credit risk of an exchange every time it makes a transaction.

There are currently no U.S. exchanges registered with the SEC where cryptocurrencies that are securities can be legally listed or traded. While Polaris anticipates that such exchanges will exist in the United States in the future, it cannot and does not guarantee that such exchanges will ever legally operate in the United States. In addition, even if other types of cryptocurrencies are successfully listed on a registered exchange in the United States, there is no guarantee that such exchange will allow the cryptocurrencies traded within the portfolios to be listed on such a registered exchange. Thus, exchanges used by Polaris may not be registered with the SEC or in compliance with applicable securities laws, rules and regulations, and any regulatory action relating to the unregistered status or non-compliance of the exchanges.

Cryptocurrency exchanges may impose daily, weekly, monthly or customer specific transaction or distribution limits or suspend withdrawals entirely, rendering the exchange of cryptocurrencies for fiat currency difficult or impossible. Additionally, cryptocurrencies prices and valuations on these exchanges have been volatile and subject to influence by many factors including the levels of liquidity on exchanges and operational interruptions and disruptions. The prices and valuation of cryptocurrencies remain subject to any volatility experienced by digital currency and cryptocurrency exchanges, and any such volatility can adversely affect Polaris' investments.

Cryptocurrency exchanges are appealing targets for cybercrime, hackers, and malware. Even the largest exchanges have ceased operations due to theft, fraud, security breach, liquidity issues, or government investigation. In addition, banks may refuse to process wire transfers to or from exchanges. Over the past several years, many exchanges have, indeed, closed due to fraud, theft, government or regulatory involvement, failure or security breaches, or banking issues. Any financial, security or operational difficulties experienced by such exchanges may result in Polaris' inability to recover money or cryptocurrencies being held by the exchange, or to pay Clients upon withdrawal.

The daily trade volume of cryptocurrencies on any given exchange may only be a small fraction of total cryptocurrencies. The lack of a regulated market for cryptocurrencies and related assets means that market participants do not have as many mechanisms to hedge or create liquidity in the cryptocurrency market that is typical of traditional capital markets. The cryptocurrency market also currently lacks many institutional participants, which could help to stabilize the market. For these reasons, among others, Polaris may be unable to purchase or sell a cryptocurrency as desired for an extended period.

Many cryptocurrency exchanges are open 24 hours a day, seven days a week, 365 days a year. The

price of cryptocurrencies can fluctuate, sometimes greatly, after traditional market hours. Polaris is not responsible for not engaging in cryptocurrency transactions after normal business hours.

Trade Errors - Polaris may possibly place trades incorrectly. If a trade error occurs, Polaris will notify the Client promptly regarding the error and its resolution. Client will bear any financial gain or loss associated with trade errors in their accounts.

Amendments to a Cryptocurrency's Network's Protocols and Software Could Adversely Affect the Investment and Trading Activities – Cryptocurrency networks (collectively, “Networks”) are typically based on protocols that govern peer-to-peer interactions between computers connected to a cryptocurrency's Network. Generally, the code that sets forth a cryptocurrency's protocol is informally managed by a development team known as the core developers. A cryptocurrency's core developers, miners, and users (each such core group in respect of a particular cryptocurrency, the “Community”) can propose amendments to a Network's source code through one or more software upgrades that alter such cryptocurrency protocols, the software that govern its Network and the properties of the cryptocurrency itself, including, but not limited to, the irreversibility of transactions and limitations on the mining/creation of new digital currency or cryptocurrency units. To the extent that a majority of a Community installs such software upgrade(s), such cryptocurrency's Network could be subject to new protocols and software that may adversely affect Polaris' investment and trading activities. If less than a majority of a Community installs such software upgrade(s), such cryptocurrency's Network could “fork.”

Many cryptocurrencies are open-source projects and, although there may be an influential group of leaders in a specific Community, there may be no official developers or group of developers that formally control the applicable Network. For many cryptocurrencies, any individual can download the applicable Network software and make any desired modifications, which are proposed to the relevant cryptocurrency's Community through software downloads and upgrades. However, the Community must usually consent to those software modifications by downloading the altered software or upgrade that implements the changes; otherwise, the changes do not become a part of that Network. A developer or group of developers could potentially propose a modification to a Network that is not accepted by the applicable Community, but that is nonetheless accepted by a substantial portion of such Community. In such a case, a “fork” in the blockchain could develop and two separate Networks could result, one running the pre-modification software program and the other running the modified version (i.e., a second such Network in respect of the same cryptocurrency). Such a fork in the blockchain typically would be addressed by Community-led efforts to merge the forked blockchains. This kind of split in a Network could materially and adversely affect the value of a Client's investments and, in the worst-case scenario, harm the sustainability of the applicable cryptocurrency's economy.

Risk to Digital Currency and Cryptocurrency's Networks from Malicious Actors - If a malicious actor or botnet (a volunteer or hacked collection of computers controlled by networked software coordinating the actions of the computers) obtains a majority of the processing power dedicated to mining on certain cryptocurrency's Networks, it may be able to alter the blockchain on which the cryptocurrency transaction relies on by constructing alternate blocks if it is able to solve for such blocks faster than the remainder of the miners on the cryptocurrency's Network can add valid blocks. In such alternate blocks, the malicious actor or botnet could control, exclude, or modify the ordering of transactions, though it could not generate new cryptocurrency or transactions using

such control. Using alternate blocks, the malicious actor could double spend its own cryptocurrency and prevent the confirmation of other users' transactions for so long as it maintains control. To the extent that such malicious actor or botnet does not yield its majority control of the processing power on various cryptocurrency Networks or the cryptocurrency Community does not reject the fraudulent blocks as malicious, reversing any changes made to the blockchain may not be possible. Such changes could adversely affect a Client's investments or the ability of Polaris to complete transactions.

Forks and Airdrops – A “fork” as described above or an airdrop (i.e., a free, unsolicited distribution of an asset to a recipient's cryptocurrency wallet) may affect the value of the original cryptocurrency held by Polaris' Custodian, which has sole discretion in electing to claim any new cryptocurrency produced from forks or airdrops. The Custodian may (i) not accommodate the new cryptocurrency; (ii) only accommodate the new cryptocurrency after a significant period; or (iii) have a contractual right to claim the new cryptocurrency for its own account. Additionally, Polaris may not have any systems in place to monitor or participate in forks or airdrops. As a result of the foregoing, Clients may not benefit from cryptocurrencies provided through airdrops, and cryptocurrencies subject to forks may be rendered useless or of no or little value.

Cryptocurrency's Miners May Cease to Solve Blocks - If the award of new digital currency and cryptocurrencies, as applicable, for solving blocks declines and transaction fees are not sufficiently high, miners may not have an adequate incentive to continue mining and may cease their mining operations. Miners ceasing operations would reduce the collective processing power on such cryptocurrency's Network, as applicable, which would adversely affect the confirmation process for transactions (i.e., decreasing the speed at which blocks are added to the blockchain until the next scheduled adjustment in difficulty for block solutions) and make such Network more vulnerable to a malicious actor or botnet obtaining control in excess of 50% of the processing power on such Network. Any reduction in confidence in the confirmation process or processing power of such Network may adversely impact an investment in the cryptocurrency.

Intellectual Property Rights Claims May Adversely Affect the Operation of the Digital Currency and Cryptocurrency's Network - Third parties may assert intellectual property claims relating to the operation of cryptocurrencies and their source code relating to the holding and transfer of such assets. Regardless of the merit of any intellectual property or other legal action, any threatened action that reduces confidence in the digital currency and cryptocurrency's long-term viability or the ability of end-users to hold and transfer digital currency and cryptocurrencies may adversely affect a Client's investments. Additionally, a meritorious intellectual property claim could prevent Polaris and other end-users from accessing the cryptocurrency's Network or holding or transferring their cryptocurrencies, which could force Polaris to terminate and liquidate a Client's cryptocurrency holdings.

The foregoing list of risks does not purport to be a complete enumeration or explanation of the risks involved in an investment with the Firm. Prospective Clients should read the entire Brochure as well as other materials that may be provided by Polaris and consult with their own independent, legal, tax, and accounting advisers prior to engaging Polaris' services.

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

Item 9 – Disciplinary Information

There are no legal, regulatory, or disciplinary events involving Polaris or its Supervised Persons.

Item 10 – Other Financial Industry Activities and Affiliations

Polaris nor its investment advisor representative have any other financial industry activities and/or affiliations.

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

Code of Ethics

We have implemented a Code of Ethics that defines our fiduciary commitment to each client. The Code of Ethics applies to all persons associated with Polaris. The Code of Ethics provides general ethical guidelines and specific instructions regarding our duties to our clients. We owe a duty of loyalty, fairness, and good faith towards each of our clients. It is our obligation to adhere not only to the specific provisions of the Code of Ethics, but also to the general principles that guide the Code of Ethics. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code of Ethics please email Michael McDermott at michael@partnerpf.com.

Personal Trading with Material Interest

We allow our Supervised Persons to purchase or sell the same securities and cryptocurrencies that may be recommended to and purchased on behalf of our clients. We do not act as principal in any transactions. We do not act as the general partner of a fund or advise an investment company. We do not have a material interest in any securities or cryptocurrencies traded in client accounts.

Personal Trading in Same Securities as Clients

Polaris allows its Supervised Persons to purchase or sell the same securities and cryptocurrencies that may be recommended to and purchased on behalf of Clients. Owning the same securities and cryptocurrencies that we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, the Code, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Polaris may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially 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 thorough review and reporting of personal securities trades by its Supervised Persons for review by the Supervised Person's supervisor or the Chief Compliance Officer (CCO). We have also adopted written policies and procedures to detect the misuse of material, non-public information. In addition, the Code governs Gifts and Entertainment given by and provided to Polaris, outside employment activities of Supervised Persons, Employee reporting, sanctions for violations of the Code, and records retention requirements for various aspects of the Code.

Personal Trading at Same Time as Client

While Polaris allows our 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 Polaris, or any associated person of Polaris, transact in any security to the detriment of any Client.

Item 12 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Broker-Dealer Selection

Our advisory services currently rely on, and require clients to use either Interactive Brokers LLC ("IB") or Altruist Financial LLC ("Altruist").

Polaris evaluates brokerage services based on the following factors:

- Commission Rates
- Execution Capability
- Operational Capability
- Responsiveness & Communication
- Financial Strength
- Trade & Recordkeeping Practices
- Cybersecurity
- Technology

Polaris seeks best execution, however, Polaris cannot guarantee that a client will receive best execution because Polaris does not control either Interactive Brokers and/or Altruist's practices.

For Clients investing in cryptocurrencies, we require Clients establish an account with Gemini Trust Company LLC, a qualified custodian under New York Banking Law ("Gemini"). Polaris is not affiliated with Gemini.

Soft Dollars

Polaris does not have any soft dollar arrangements with Altruist Financial LLC, Interactive Brokers LLC, Gemini, or any broker-dealer or cryptocurrency custodian.

Brokerage Referrals

Neither Polaris nor any of its related persons receive Client referrals from any broker dealers or third parties.

Directed Brokerage

All Clients are serviced on a “directed brokerage basis”, where Polaris will place trades within the established account[s] at Altruist, Interactive Brokers or Gemini. 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]). Polaris 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.

Economic Benefits

As a registered investment adviser, we have access to the institutional platform of your account custodian. As such, we will also have access to research products and services from your account custodian and/or another brokerage firm. These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms, and are not considered to be paid for with soft dollars. However, you should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.

Aggregating & 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 order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Polaris will execute its transactions through the Custodian as authorized by the Client. Polaris may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. 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 particular Client accounts. Accounts for the firm or associated persons may be included in the block.

Item 13 – Review of Accounts

Frequency of Reviews

Client accounts and securities are regularly monitored by our software, financial advisors, and principals. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the client.

Causes for Reviews

In addition, to the Client’s annual review, further reviews may be triggered due to:

- Client Request

- Changes in a client's life events, financial situation, risk tolerance, and/or macro conditions.
- Large deposits or withdrawals of Client funds.
- Changes in investment strategy

Clients are encouraged to notify their advisor or Polaris if any of the above listed changes occur or if a financial situation may adversely affect the Client's investment strategy.

Review Reports

Clients receive brokerage statements no less than quarterly from Interactive Brokers. 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).

Item 14 – Client Referrals & Other Compensation

Compensation Received by Polaris

Polaris is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. Polaris does not receive commissions or other compensation from product sponsors, broker-dealers or any unrelated third party. Polaris may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its clients. We make these professionals available to you as a convenience only and neither our firm nor persons associated with our firm are compensated if you engage these unaffiliated service providers. You are not obligated to work with the professionals made available to you by our firm and you do so at your sole discretion. We are not responsible or liable for any services provided to you by these outside professionals and any use of these other professionals by you will not affect the advisory fee you pay to us. If you choose to work with an unaffiliated service provider made available to you by us, you engage these other professionals directly at your own expense. These arrangements, and any related fees, would be separate and distinct from any investment advisory services provided by us. Likewise, Polaris may receive referrals of new Clients from a third-party.

Client Referrals from Solicitors

Polaris has entered into Solicitor Referral Agreements with several Intermediaries, whereby the Adviser compensates an Intermediary for referring Clients to Polaris. The Adviser may enter into Solicitor Referral Agreements with banks, credit unions, and other financial institutions, which may or may not be affiliated or associated with Polaris. A Solicitor Referral Agreement may create an incentive for an Intermediary to refer a prospective Client to Polaris, even if an Intermediary would not otherwise make the referral. Polaris may pay Intermediaries a flat fee or a percentage of the regular fee charged to the Client for services rendered by Polaris. In no instance will this result in higher fees being charged to Clients referred to Polaris. Polaris will not charge Clients any additional fees or expenses because of Solicitor Referral Agreements. Clients will receive a written disclosure statement regarding these arrangements in accordance with the requirements of Rule 206(4)-3 under the Advisers Act. A referral by an Intermediary should not be viewed by a client as an endorsement of the Adviser's services.

Item 15 – Custody

Polaris utilizes either Interactive Brokers LLC (“IB”) or Altruist Financial LLC (“Altruist”) to custody Client funds and securities. Polaris does not accept or maintain custody of any Client accounts, except for the authorized deduction of fees. Trade confirmations and statements are made available electronically to all Clients directly from Interactive Brokers, LLC and/or Altruist. Clients are encouraged to carefully review confirmations and statements and to call with any questions/concerns. Polaris encourages Clients to review the monthly and quarterly statements provided by Interactive Brokers Group and Altruist.

Client cryptocurrency investments are held at Gemini, a qualified custodian. Polaris is deemed to have limited custody when reporting performance, asset values, and fees to the client via Polaris’ Client and Financial Advisor Portal. This data and asset values will come directly from the client’s individually titled accounts at Gemini.

Gemini’s offline storage systems use multi-signature technology, role-based governance protocols, and multiple layers of biometric access controls and physical security to safeguard customer assets. Mandatory whitelisting enhances account-level security.

The custody infrastructure at Gemini’s geographically distributed, 24/7 access-controlled secured facilities cannot be accessed by anyone without the proper credentials. The hardware security modules (“HSMs”) storing private keys are never connected to the internet and are kept air-gapped inside safes in locked cages. Gemini’s HSMs have achieved the highest levels of the U.S. government’s security ratings.

Polaris has designed the cryptocurrency SMAs to have the same permissions and internal controls as an SMA on a traditional custodial platform such as Fidelity or Charles Schwab. **Below is a description of what Polaris has permission to do as a digital SMA Manager:**

1. Polaris can create exchange and custody accounts in the client’s name
2. Polaris can execute trades in the client’s exchange account from USD to any cryptocurrency and from any cryptocurrency to USD (when the client withdraws or terminates)
3. Polaris can move the client’s cryptocurrencies ONLY between the client’s exchange account and the client’s custody account
4. Polaris can send the client’s USD back to their original bank account that the client wired from to originally fund the SMA.

Below is what Polaris is restricted from doing as a digital SMA Manager:

1. Polaris cannot move the client’s cryptocurrency outside of Gemini. The client’s cryptocurrencies will always be in their custodial account or exchange account in the Client’s name and the Client is the sole legal owner.
2. Polaris cannot move the Client’s cryptocurrency to any other account within Gemini other than the Client’s custody account and exchange account in their name.

The Client’s cryptocurrencies will always be in a custody or exchange account in their name. All Polaris has permission to do is execute trades in the client’s exchange account and move cryptocurrencies between the Client’s exchange account and custody account.

Item 16 – Investment Discretion

Polaris 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 Polaris. 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 Polaris will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Polaris does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from IBG and/or Altruist. The Client retains the sole responsibility for proxy decisions and voting. Polaris will assist in answering questions relating to proxies. Clients can contact their advisor either via email or phone with questions relating to proxy-voting and/or solicitations.

Item 18 – Financial Information

Polaris is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. Polaris is not subject to any financial commitment that impairs its ability to meet contractual and fiduciary commitments to its Clients.

Form ADV Part 2B – Brochure Supplement
for
Michael J. McDermott
Principal, Chief Compliance Officer

March 31, 2023

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Michael J. McDermott (CRD# 6596088) in addition to the information contained in the Polaris Financial, LLC (“Polaris” or the “Advisor”) (CRD # 281952) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Polaris Disclosure Brochure or this Brochure Supplement, please contact us via our website <http://partnerpf.com>.

Additional information about Mr. McDermott is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6596088.

Item 2 – Educational Background & Business Experience

Michael J. McDermott is dedicated to advising Clients of Polaris as a Principal and Wealth Advisor at Polaris. Mr. McDermott earned a Bachelor of Science from Bentley University. Mr. McDermott is thirty-two years old. Additional information regarding Mr. McDermott's employment history is below.

Employment History:

Principal, Wealth Advisor Polaris Financial, LLC	12/2015 to Present
Financial Advisor, Douugh Wealth, LLC	02/2021 to 04/2022
Senior Solutions Consultant, Oracle	08/2015 to 8/2022
Operations Analyst, Bright Horizons Family Solutions	05/2015 to 07/2015
Finance Associate, iSoftStone, Inc.	05/2011 to 05/2015

Item 3 – Disciplinary Information

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

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. McDermott.**

However, we do encourage you to independently view the background of Mr. McDermott on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6596088.

Item 4 – Other Business Activities

Mr. McDermott has no other business activities.

Item 5 – Additional Compensation

Mr. McDermott does not receive additional compensation.

Item 6 – Supervision

Mr. McDermott serves as the Principal and Chief Compliance Officer of Polaris. Mr. McDermott can be reached at (708)-487-1458.

As indicated above, Polaris has implemented a Code of Ethics, an internal compliance document that guides Supervised Person in meeting their fiduciary obligations to Clients of Polaris. Further, Polaris is subject to regulatory oversight by various agencies. These agencies require registration by Polaris and its Supervised Persons. As a registered entity, Polaris is subject to examinations by regulators, which may be announced or unannounced. Polaris 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
Evan Kulak
Principal, Wealth Advisor
March 31, 2023

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Evan A. Kulak (CRD# 6284773) in addition to the information contained in the Polaris Financial, LLC (“Polaris” or the “Advisor”) (CRD # 281952) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Polaris Disclosure Brochure or this Brochure Supplement, please contact us via our website <http://partnerpf.com>.

Additional information about Mr. Kulak is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6284773.

Item 2 – Educational Background and Business Experience

Evan A. Kulak is dedicated to advising Clients of Polaris in his role as a Principal, Wealth Advisor at Polaris. Mr. Kulak earned a Bachelor of Arts in from Bowdoin College. Mr. Kulak is thirty one years old. Additional information regarding Mr. Kulak's employment history is included below.

Employment History:

Principal, Wealth Advisor, Polaris Financial, LLC	12/2015 to Present
Financial Advisor, Douough Wealth, LLC	02/2021 to 03/2023
APM, Fifth Third Private Bank	06/2015 to 04/2016
Operations Analyst, Cadence Capital Management	11/2014 to 06/2015
Analyst, Merrill Edge	06/2013 to 01/2014

Item 3 – Disciplinary Information

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

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. Kulak.**

However, we do encourage you to independently view the background of Mr. Kulak on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6284773.

Item 4 – Other Business Activities

Mr. Kulak has no other business activities.

Item 5 – Additional Compensation

Mr. Kulak does not receive additional compensation.

Item 6 – Supervision

Mr. Kulak serves as a Principal and Wealth Advisor of Polaris. Mr. Kulak can be reached at (708)-996-0213.

As noted above, Polaris has implemented the Code of Ethics, an internal compliance that guides Supervised Persons in meeting their fiduciary obligations to Clients of Polaris. Further, Polaris is subject to regulatory oversight by various agencies. These agencies require registration by Polaris and its Supervised Persons. As a registered entity, Polaris is subject to examinations by regulators, which may be announced or unannounced. Polaris 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 2A - Appendix 1
Wrap Fee Program Brochure
March 31, 2023

Firm Name: Polaris Financial, LLC

Address: 6 Liberty Square # 2663
Boston, MA 02109

phone: (708)-880-7098

email: support@partnerpf.com

website: www.partnerpf.com

CRD# 281952 / SEC#: 801-107177

This wrap fee program brochure provides information about the qualifications and business practices of Polaris Financial, LLC (Polaris). If you have any questions about the contents of this brochure, please contact us at micahel@partnerpf.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Polaris also is available on the SEC's website at www.adviserinfo.sec.gov. Please search our full firm name or our CRD# 281952.

Polaris is a registered investment advisor with the SEC. The information in this brochure has not been approved or verified by SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training.

Item 2 – Material Changes

This Item 2 summarizes specific materials changes that have occurred since our last annual update of our brochure, which was filed on October 27, 2022.

Material Changes

- The firm has updated its broker dealer and custodian information.

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Item 4 – Services Fees and Compensation

Services

We take a goal-oriented approach to financial advice. We utilize quantitative and qualitative methods to determine client goals, age, risk tolerance, investment experience, time horizon, net worth, and investment preferences. The gathered information is utilized to recommend an appropriate financial strategy and model portfolio. Advisory services we provide may include:

- | | |
|-----------------------|-------------------------|
| • Investment Strategy | • Life Event Planning |
| • Asset Allocation | • Portfolio Rebalancing |
| • Risk Tolerance | • Fund Selection |
| • Financial Planning | • Portfolio Monitoring |

We may invest client assets according to one or more model portfolios developed by our team. We offer five model portfolio series; each series is composed of four portfolios with distinct objectives and risk tolerances level. Risk tolerance levels include conservative, moderately conservative, moderate, and aggressive. We utilize a rules-based tactical asset allocations strategy for each model portfolio. We may buy, sell, or re-allocate positions based on market conditions. A tactical asset allocation strategy does not guarantee superior investment returns.

Our model portfolios are generally comprised of five to twelve exchange traded funds (ETFs). Each ETF provides exposure to specific asset classes: domestic and international equities, fixed income, real estate investment trusts, and gold. Below please find a list of each series:

- Core
- Income
- Inflation Protection
- Environmental, Social, Governance
- Biblically Responsible

Portfolios can be customized upon request or at advisor discretion. Custom portfolios may include a mix of mutual funds, ETFs, and/or separately managed accounts. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs for both our model and custom portfolios.

All accounts are established in accordance with our wrap fee program. A wrap fee program is an investment program that bundles the cost for securities transaction fees in the overall investment advisory fee. You should consider that, depending on the amount of activity in your account and the value of custodial, trade execution, advisory, and other services that are provided under the arrangement, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately or by others. Please see Appendix 1 – Wrap Fee Program Brochure, which is included as part of this Brochure for more details.

Compensation

Clients pay a 1.5% annual fee billed monthly in arrears pursuant to the terms of the client investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of each calendar month. Fees may be negotiable at the sole discretion of the Advisor.

We will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. We will send you an invoice showing the amount of the fee. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy. It is your responsibility to verify the accuracy of these fees as listed on the custodian's brokerage statement.

Item 5 – Account Requirements and Types of Clients

Polaris provides investment advisory services to individuals. Polaris has a minimum account size requirement of \$500 (USD). The minimum account size is negotiable at the sole discretion of Polaris.

Item 6 – Portfolio Manager Selection and Evaluation

Portfolio Manager Selection

Polaris acts as sponsor and as portfolio manager for this Wrap Fee Program. Advisory services are

detailed in Item 4 – Services Fees and Compensation of the Disclosure Brochure.

Related Persons

Polaris' Advisory Persons serve as the portfolio manager for services under this Wrap Fee Program. Polaris does not act as portfolio manager for any third-party wrap fee programs.

Supervised Persons

Polaris's personnel serve as portfolio manager[s] for services under this Wrap Fee Program. Please refer to the complete Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on the services provided by Polaris and the Brochure Supplement for the background of Mr. Kulak.

Performance-Based Fees

Polaris does not charge performance-based fees for its investment advisory services. The fees charged by Polaris are as described in "Item 4 – Services Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any Client.

Polaris 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.

Methods of Analysis

Polaris' investment analysis and research is grounded in tactical asset allocation and global diversification.

Tactical Asset Allocation (TAA) is an active management portfolio strategy. TAA utilizes a rules-based strategy that shifts the allocation of the portfolio based on quantitative factors and economic indicators. Quantitative factors and indicators include valuation and market momentum criteria. These criteria are derived from market data, third party research materials, and online research systems.

While TAA helps us evaluate and construct a portfolio it does not guarantee that the investment will increase in value. Assets may lose value and may have negative investment performance. We monitor these quantitative factors and indicators to determine if adjustments to allocations are appropriate. More details on our review process are included below in Item 13 – Review of Accounts. We generally employ a long-term investment strategy for you, as is consistent with your financial goals. We will typically hold a security for more than a year but may hold for shorter periods based on the TAA strategy. A TAA strategy does not guarantee superior investment returns to that of other investment strategies.

Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. You should be prepared to bear the potential risk of loss. There is no guarantee that you will meet your investment goals. The following are some of the risks specific to our investment strategies:

TAA Risk

TAA may increase the risk of a portfolio. TAA engages in market timing which involves shifting allocations based on market conditions. This can result in frequent trading which may lead to a decrease in performance and/or increase in portfolio risk. TAA does not guarantee better superior returns.

Market Risks

The value of your 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.

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.

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. Please see Item 8.B. – Risk of Loss in the Disclosure Brochure for details on investment risks.

Voting Client Securities

Polaris 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 7 – Client Information Provided to Portfolio Managers

Polaris is the sponsor and sole portfolio manager for the Program. The Advisor does not share Client information with other portfolio managers because it is the sole portfolio manager for this Wrap Fee Program. Please also see the Polaris Privacy Policy (included after this Wrap Fee Program Brochure).

Item 8 – Client Contact with Portfolio Managers

Clients may request to speak with the Portfolio Managers at Polaris.

Item 9 – Additional Information

Disciplinary Information and Other Financial Industry Activities and Affiliations

Disciplinary Information

There are no legal, regulatory, or disciplinary events involving Polaris or its Supervised Persons.

Other Financial Activities and Affiliations

There are no other financial activities or affiliations for the firm or its representatives.

Participation in Institutional Advisor Platform

Our advisory services currently rely on, and require clients to use either Interactive Brokers LLC (“IB”) or Altruist Financial LLC (“Altruist”). “IB” and “Altruist” are the execution brokers, clearing brokers, and custodians (“Custodians”). Polaris evaluates IB’s and Altruist’s services based on their fiduciary obligation to seek best execution, however, Polaris cannot guarantee that a client will receive best execution because Polaris does not control IB’s or Altruist’s brokerage practices. Polaris evaluates best execution based on the following criteria:

- | | |
|----------------------------------|--------------------------------------|
| ● Commission Rates | ● Financial Strength |
| ● Execution Capability | ● Trade & Recordkeeping Practices |
| ● Operational Capability | ● Cybersecurity |
| ● Responsiveness & Communication | ● Comparison to other broker-dealers |

Soft Dollars

Polaris does not have any soft dollar arrangements with Altruist, Interactive Brokers LLC, or any broker-dealer.

Brokerage Referrals

Neither Polaris nor any of its related persons receive Client referrals from any broker dealers or third parties.

Directed Brokerage

All Clients are serviced on a “directed brokerage basis”, where Polaris will place trades within the established account[s] at either Interactive Brokers or Altruist. 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]). Polaris 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 Custodians, Interactive Brokers and Altruist.

Economic Benefits

As a registered investment adviser, we have access to the institutional platform of your account custodian. As such, we will also have access to research products and services from your account custodian and/or another brokerage firm. These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms, and are not considered to be paid for with soft dollars. However, you should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.

Aggregating & 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 order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Polaris will execute its transactions through the Custodian as authorized by the Client. Polaris may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. 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 particular Client accounts. Accounts for the firm or associated persons may be included in the block.

Code of Ethics, Review of Accounts, Client Referrals, and Financial Information

As noted above, Polaris has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code applies to all persons associated with Polaris. Complete details on the

Polaris Code can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

Review of Accounts

Frequency of Reviews

Client accounts and securities are regularly monitored by our software, financial advisors, and principals. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the client.

Causes for Reviews

In addition, to the Client's annual review, further reviews may be triggered due to:

- Client Request
- Changes in a client's life events, financial situation, risk tolerance, and/or macro conditions.
- Large deposits or withdrawals of Client funds.
- Changes in investment strategy

Clients are encouraged to notify their advisor or Polaris if any of the above listed changes occur or if a financial situation may adversely affect the Client's investment strategy.

Review Reports

Clients receive brokerage statements no less than quarterly from Interactive Brokers and/or Altruist. 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). Polaris also provides Clients with an online portal where they can view their account data and download their account statements.

Other Compensation

Please see Item 14 - Other Compensation in the Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on additional compensation that may be received by Polaris or their principal owners. Mr. Kulak and Mr. McDermott's Brochure Supplement (also included with this Wrap Fee Program Brochure) provides details on outside business activities and the associated compensation, as applicable.

Client Referrals from Solicitors

Polaris has entered into Solicitor Referral Agreements with several Intermediaries, whereby the Adviser compensates an Intermediary for referring Clients to Polaris. The Adviser may enter into Solicitor Referral Agreements with banks, credit unions, and other financial institutions, which may or may not be affiliated or associated with Polaris. A Solicitor Referral Agreement may create an incentive for an Intermediary to refer a prospective Client to Polaris, even if an Intermediary would not otherwise make the referral. Polaris may pay Intermediaries a flat fee or a percentage of the regular fee charged to the Client for services rendered by Polaris. In no instance will this result in higher fees being charged to Clients referred to Polaris. Polaris will not charge Clients any

additional fees or expenses because of Solicitor Referral Agreements. Clients will receive a written disclosure statement regarding these arrangements in accordance with the requirements of Rule 206(4)-3 under the Advisers Act. A referral by an Intermediary should not be viewed by a client as an endorsement of the Adviser's services.

Financial Information

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

Privacy Policy

Effective Date: February 3, 2023

Our Commitment to You

Polaris Financial, LLC (“Polaris” 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. Polaris (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.

Polaris 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. By law, we are required to notify you of our privacy policy on an annual basis. Although we reserve the right to change our policy, we will tell you of the changes promptly.

Why you need to know?

Registered Investment Advisers (“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. RIAs are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law.

What information do we collect from you?

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. Below are some examples. When you are no longer our customer, we may continue to share your information only as described in this notice.

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.

Cookies. In addition, we may use "cookies" on certain pages of our Site. Cookies are small files that can be used to track a user's steps or automatically generate a user's password. Some features of our website may only be available through the use of a cookie. Among other things, cookies allow you to enter your password less frequently during a session. Cookies can also help us provide information which is targeted to your interests. Cookies are stored on your hard drive, not on our Site. Most, but not all, cookies are automatically deleted at the end of a session. You may decline our cookies if your browser permits, although your use of the Site may then be restricted (as noted above).

Third Party Analytics. We and the third-party technology providers, ad exchanges, ad networks, advertisers, agencies, ad exchanges, and ad servers with which we work may use third-party analytics services to compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. You consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

How do we share your information?

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

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share nonpublic personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, trading exchanges, technology platforms, and other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No

Marketing Purposes Polaris 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 Polaris or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your nonpublic personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients Polaris does not disclose and does not intend to disclose, nonpublic personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

In accordance with any state or federal laws, we may be required to release information in certain circumstances (i.e., protection against fraud, responding to a subpoena, or reporting to a credit bureau).

FEDERAL & STATE LAW ALLOWS YOU TO LIMIT SHARING – OPTING OUT

Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: sharing for non-affiliates’ everyday business purposes – information about your creditworthiness; or sharing with affiliates or non-affiliates who use your information to market to you. State laws and individual companies may give you additional rights to limit sharing.

State-specific Regulations

Massachusetts	In response to a Massachusetts law, clients must “opt-in” to share nonpublic personal information with non-affiliated third parties before any personal information is disclosed. We may disclose nonpublic personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.
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Changes to our Privacy Policy

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

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

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us via our website <http://partnerpf.com>.

Please notify us immediately if you choose to opt out of these types of sharing or if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.