

# Acrylic Financial, Inc.

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Acrylic Financial, Inc. If you have any questions about the contents of this brochure, please contact us at (833) 422-7954 or by email at: [info@Acrylicfinancial.com](mailto:info@Acrylicfinancial.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Additional information about Acrylic Financial, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Acrylic Financial, Inc.'s CRD number is: 288263.*

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*Registration as an investment adviser does not imply a certain level of skill or training.*

Version Date: 10/11/2023

## **Item 2: Material Changes**

There are the following material changes in this brochure from the last annual updating amendment of Acrylic Financial, Inc. on 03/06/2023. Material changes relate to Acrylic Financial, Inc.'s policies, practices or conflicts of interests only.

The firm has added a fee schedule for its assets under advisement services. (Items 4 & 5)

The firm no longer uses the custodian TD Ameritrade. (Item 12)

The firm now uses the custodian Charles Schwab & Co., Inc. Advisor Services. (Items 12 & 14)

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

Acrylic Financial, Inc. (hereinafter “Acrylic”) is a Corporation organized in the State of Arizona. The firm was formed in February 2017 and first became licensed as an investment adviser in Arizona in May 2017, and the principal owners are David Racich, Charles Anthony Truhlar and Ashley Megan Racich. Charles Anthony Truhlar who is also the firm’s president and chief compliance officer will serve as designated principal for the firm in Illinois.

### B. Types of Advisory Services

#### *Portfolio Management Services*

Acrylic offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Acrylic creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Assessment of Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Acrylic evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Acrylic will request but not require discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Acrylic seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Acrylic’s economic, investment or other financial interests. To meet its fiduciary obligations, Acrylic attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Acrylic’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Acrylic’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Acrylic may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Before selecting other advisers for clients, Acrylic will always ensure those other advisers are properly licensed or registered as an investment adviser. Acrylic conducts due diligence on any third-party investment adviser, which may involve one or more of the following: phone calls, meetings and review of the third-party adviser's performance and investment strategy. Acrylic then monitors the performance of the third party and acts as the go between

with the third party. by referring the client to the third-party adviser. These investments may be allocated either through the third-party adviser's fund or through a separately managed account managed by such third-party adviser on behalf of Acrylic's client. Acrylic may also allocate among one or more fund advisers. Acrylic will review the ongoing performance of the third-party adviser as a portion of the client's portfolio.

### ***Selection of Other Advisers***

Acrylic may direct clients to third-party investment advisers. Before selecting other advisers for clients, Acrylic will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where Acrylic is recommending the adviser to clients.

### ***Assets Under Advisement***

Acrylic is adding a fee structure for assets under advisement. Acrylic now provides advice on assets that the firm will not hold and that would be deemed to be under advisement and held by outside custodians.

### ***Financial Planning***

Financial plans and financial planning may include but are not limited to: investment planning; insurance planning; tax planning & integration, retirement planning, education planning and debt/credit planning. It can take at least 1-10 hours to complete a financial plan, depending on the case details. Acrylic will not charge clients a fee for any hours worked on a financial plan that would exceed 10 hours.

**Investment Planning:** Creating an investing strategy to help the client meet long and short-term goals, such as retirement or buying a house. By taking into account risk tolerance, diversification and asset allocation, investment plans are designed to help the client decide how much to invest in stocks, bonds, cash and real estate in order to maximize returns for the stated goals. May also assist in choosing amongst a broad range of investments available, including those inside a company sponsored retirement plan.

**Insurance Planning:** Insurance planning includes evaluating risks and determining the proper insurance coverage to mitigate those risks. The principal goal of insurance planning is to identify and analyze risk factors in life and seek proper coverage for those risks. All lines of insurance may or may not be included in any individual insurance planning agreement.

**Tax Planning & Integration:** Tax planning include timing of income, size, and timing of purchases, and planning for other expenditures. Also, the selection of investments and types of retirement plans must complement the tax filing status and deductions to create the best possible outcome. Tax efficiency of investments, income, deductions, and filing status are all considered.

**Retirement Planning:** Retirement planning includes determining retirement income goals and the actions and decisions necessary to achieve those goals. Retirement planning includes identifying sources of income, estimating expenses, implementing a savings program and

managing assets. Social Security planning is included in this offering. Future cash flows are estimated to determine if the retirement income goal will be achieved. Other non-financial aspects taken into consideration include lifestyle choices, where to live, when to completely quit working, etc.

**Education Planning:** Education planning includes financial considerations for higher education funding. Income, time horizon, geography, institution preference, are taken into consideration. Most appropriate investment vehicles are analyzed and recommended.

**Debt/Credit Planning:** Debt/Credit planning includes establishing budgets, analyzing income and expenses, creating an income statement, analyzing debt vehicles, and making recommendations for efficiencies.

### ***Hedge Funds***

Acrylic is the manager and provides advice to Acrylic Explorer Fund LP. The advisory fees that Acrylic receives for providing those services are set forth in the agreement between Acrylic and the Fund. Additional detail about the fees charged to an investor in such fund is available in the current prospectus for the fund. Pooled investment vehicles are responsible for the payment of all third-party fees (i.e., custodian fees, brokerage fees, accounting/audit fees, administration fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Acrylic.

### ***Services Limited to Specific Types of Investments***

Acrylic generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs which are exchange traded), hedge funds, insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities through ETF's, non-U.S. securities and, although Acrylic primarily recommends ETF's. Acrylic may use other securities as well to help diversify a portfolio when applicable.

## **C. Client Tailored Services and Client Imposed Restrictions**

Acrylic will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by Acrylic on behalf of the client. Acrylic may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

We practice goal-oriented financial planning advice intended as a supplement to our portfolio management services. We may utilize third party planning software in the analysis and quantification of your current financial positions, as well as the analysis of your financial goals and objectives.

## D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. Acrylic does not participate in wrap fee programs.

## E. Assets Under Management

Acrylic has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$72,416,313.00	\$0.00	December 2022

Acrylic has \$3,000,000.00 in Assets Under Advisement.

# Item 5: Fees and Compensation

## A. Fee Schedule

### *Portfolio Management Fees*

Total Assets Under Management	Annual Fees
\$0 - \$249,999	1.80%
\$250,000 - \$999,999	1.75%
\$1,000,000 & Above	1.65%

Accounts will be aggregated from same households to calculate the fees unless client instructs them otherwise.

Lower fees for comparable services may be available from other sources.

For new accounts, Acrylic will bill the pro-rated amount for the remainder of the initial month, based on the average daily balance in the billing period.

An average of the daily balance in the client's account throughout the billing period is used to determine the bases of the fee of the assets upon which the advisory fee is based. There is a \$50.00 first year setup fee per account established. This fee is deducted one time by the custodian directly from your account. The average daily balance is used to determine calculate the monthly fee.

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of Acrylic's fees within five business days of signing the Investment Advisory Contract. Thereafter,



clients may terminate the Investment Advisory Contract generally with 30 days' written notice. Upon termination any earned unpaid fee will be paid to adviser based on date of termination.

Fees are paid monthly in arrears. The advisory fee is calculated using the value of the assets in the average daily balance Management Fees for the initial month shall be calculated on a pro rata basis commencing on the day the Assets are initially designated to us for management under this Agreement.

### ***Selection of Other Advisers Fees***

Acrylic may engage on the recommendation of third-party money managers, but does not have any such arrangements in place at this time. Acrylic will receive its standard fee on top of the fee paid to the third-party adviser. This relationship will be memorialized in each contract between Acrylic and each third-party adviser. The fees are in excess of that normally charged in the industry, and similar advisory services can be obtained for less. The combined advisory fee charged by Acrylic and third-party advisers will not exceed 2%. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

### ***Assets Under Advisement Fees***

<b>Total Assets Under Management</b>	<b>Annual Fees</b>
\$0 - \$249,999	1.80%
\$250,000 - \$999,999	1.75%
\$1,000,000 & Above	1.65%

### ***Financial Planning Fees***

#### **Fixed Fees**

The negotiated fixed rate for creating client financial plans is between \$50 and \$5,000. Fixed fees are available as a single service (a la carte) financial planning service, and only if the scope of the engagement can be well defined in advance after review of the initial consultation information (there is no charge for initial consultations). The fixed fee will vary based on the Acrylic's opinion of the complexity of the subject and the length of time and resources necessary to complete the plan. The fixed fee will also vary based on the skill and experience of the individual adviser providing the service. Acrylic reviews and requests for a fixed fee service to determine, based on the scope of the engagement, if a fixed fee will be in the client's best interest vs. an hourly fee. Fixed fees will not differ between individual, or corporation based on that merit alone, but rather complexity and the scope of the service. Acrylic will consider the complexity of the plan and nature of the client in order to determine whether it would recommend the fixed financial planning fee or the hourly financial planning to a client.

## Hourly Fees

The hourly fee for these services is between \$100 and \$265. This hourly fee range varies depending on the skill and experience of the adviser, and the level of support necessary depending on the case complexities. The hourly fees apply to services detailed in the financial planning agreement. It can take at least 1-10 hours to complete a financial plan, depending on the case details.

In offering financial planning, a conflict exists between the interests of the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser. This statement is required by California Code of Regulations, 10 CCR Section 260.235.2.

Clients may terminate the agreement without penalty, for full refund of Acrylic's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice. In the event of the early termination of the contract prior to the completion of the financial plan, Acrylic will deliver upon termination that portion of the financial plan that has been prepared to the client.

## **B. Payment of Fees**

### *Payment of Portfolio Management Fees*

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in arrears.

### *Payment of Selection of Other Advisers Fees*

The timing, frequency, and method of paying fees for the selection of third-party managers will depend on the specific third-party adviser selected.

### *Payment of Assets under Advisement Fees*

The fees are withdrawn from client accounts with client written authorization & Invoiced. In the event that a direct fee deduction option is unavailable, fees can be paid via cash, check, or wire. Fees are paid monthly and in arrears.

### *Payment of Financial Planning Fees*

Financial planning fees are paid via check and wire.

Fixed financial planning fees are paid 100% in advance, but Acrylic neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance of the delivery of the services represented by the prepayment.

Hourly financial planning fees are collected in advance, but Acrylic neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance. Acrylic will not charge clients a fee for any hours worked on a financial plan that would exceed 10 hours. Hourly financial planning fees are paid 100% in advance, but Acrylic neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance of the delivery of the services represented by the prepayment.

### **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third-party fees (i.e., custodian fees, brokerage fees and commissions, internal mutual fund fees for management and administration (which are disclosed in each fund's prospectus), transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Acrylic. Please see Item 12 of this brochure regarding broker-dealer/custodian.

### **D. Prepayment of Fees**

Acrylic collects fees in advance and arrears. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check, or return deposit back into the client's account.

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

### **E. Outside Compensation For the Sale of Securities to Clients**

All representatives of Acrylic, in their outside business activities (see Item 10 below) are licensed to accept compensation for the sale of securities and insurance to Acrylic clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of securities or investment products for which the supervised persons receives compensation, Acrylic will document the conflict of interest in the client file and inform the client of the conflict of interest. Clients always have the right to decide whether to purchase Acrylic -recommended products and, if purchasing, have the right to purchase those products through other brokers or agents that are not affiliated with Acrylic. Acrylic will disclose if they receive more than 50% of revenue from advisory clients results from commissions and other compensations. Advisory fees are not charged in addition to compensation.

Acrylic has a selling agreement in place with Brooklight Place Securities. Acrylic will provide an asset-based fee to Brooklight Place Securities for any registered representatives that become investment adviser representatives of Acrylic. Acrylic will provide 10 basis points (0.10%) on new Assets Under Management ("AUM") acquired after the Investment Adviser Representative becomes a registered representative. Fees will be paid on a monthly basis directly from Acrylic in accordance with the billing agreement provided on Acrylic account opening. Acrylic does not "sell" any securities

through Acrylic. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. Acrylic will document the conflict of interest in the client file and inform the client of the conflict of interest. Conflicts are firstly avoided if possible, and if that is not possible conflicts of interest are disclosed on the ADV's delivered to the client before account opening. Clients have the option to purchase investment products that Acrylic and its supervised persons recommend through other brokers or agents that are not affiliated and/or do not have an arrangement with Acrylic. Acrylic does not sell anything with a commission or markup. If a dually registered IAR deems it to be in the clients best interest to purchase a commissionable product, that product is not then managed by Acrylic, therefore no Acrylic fees are reduced.

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

Acrylic does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client and therefore Acrylic does not engage in side-by-side management.

Acrylic is the manager and provides advice to Acrylic Explorer Fund LP. Any and all fees received are set forth in the agreement between Acrylic and the Fund. Additional details about the fees charged to an investor in such fund is available in the limited partnership agreement for that specific fund.

## **Item 7: Types of Clients**

Acrylic generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Other Investment Advisers
- ❖ Corporations
- ❖ Pooled Investment Vehicles

There is no account minimum for any of Acrylic's services.

## **Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss**

### **A. Methods of Analysis and Investment Strategies**

#### *Methods of Analysis*

Acrylic's methods of analysis include Fundamental analysis, Technical Analysis and Modern portfolio theory.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Technical analysis** involves the analysis of past market data; primarily price and volume.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

### *Investment Strategies*

Acrylic uses both asset allocation and active models based on moving averages.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **B. Material Risks Involved**

### *Methods of Analysis*

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

**Modern portfolio theory** assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

## *Investment Strategies*

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Selection of Other Advisers:** Although Acrylic will seek to select only money managers who will invest clients' assets with the highest level of integrity, Acrylic's selection process cannot ensure that money managers will perform as desired, and Acrylic will have no control over the day-to-day operations of any of its selected money managers but will monitor the investments of the Account managed by other third-party investment advisers. Acrylic would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

**Short term trading** risks include liquidity, economic stability, and inflation, in addition to the long-term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Acrylic is the manager and provides advice to Acrylic Explorer Fund LP. The methods of analysis, investment strategies, & risk of loss for such services are generally described in the Fund's offering documents.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **C. Risks of Specific Securities Utilized**

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have internal costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed

income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing principal price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. In non-index ETF purchased at a premium may ultimately be sold at a discount

**Real estate** funds (including REITs exchange traded) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

**Hedge Funds** often engage in leveraging and other speculative investment practices that may increase the risk of investment loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; may involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.



**Commodities** are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain. Commodities will be accessed through ETF's.

**Non-U.S.** securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## Item 9: Disciplinary Information

### A. Criminal or Civil Actions

There are no criminal or civil actions to report.

### B. Administrative Proceedings

There are no administrative proceedings to report.

### C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

*Clients can obtain the disciplinary history, if any, of Acrylic and its representatives from the Massachusetts Securities Division upon request. Please also see below for a discussion of applicable disciplinary history. The number for the division is (617) 727-3548.*

## Item 10: Other Financial Industry Activities and Affiliations

### A. Registration as a Broker/Dealer or Broker/Dealer Representative

Acrylic has a selling agreement in place with Brooklight Place Securities. Acrylic will provide an asset-based fee to Brooklight Place Securities for any registered representatives that become investment adviser representatives of Acrylic. Acrylic will provide between 5 (0.05%) and 10 basis points (0.10%) on new Assets Under Management ("AUM") acquired after the Investment Adviser Representative becomes a registered representative. Fees will be paid on a monthly basis directly from Acrylic in accordance with the billing agreement provided on Acrylic account opening.



## **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither Acrylic nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

## **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

All representatives of Acrylic are licensed insurance agents, Owner and President with Charles Truhlar & Associates and can affect transactions in various insurance products, including life, health, disability, long-term care, and annuities for commission-based compensation. Clients are instructed that the fees paid to Acrylic for advisory services are separate and distinct from the commissions earned for placing the client in insurance products. Clients to whom Acrylic offers advisory services are informed that they are under no obligation to use Mr. Truhlar or any of our affiliated persons or entities for insurance services and may use the insurance brokerage firm and agent of their choice. This activity creates a conflict of interest since there is an incentive to recommend insurance products based on commissions or other benefits received from the insurance company, rather than on the client's needs. Additionally, the offer and sale of insurance products by supervised persons of Acrylic are not made in their capacity as a fiduciary, and products are limited to only those offered by certain insurance providers. Acrylic addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. The firm expects that clients to whom it offers advisory services may also be clients for whom all representatives act as an insurance agent. Acrylic periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. Clients have the right to decide on the act of that insurance agent recommendation and have the right to choose the professional to do so.

All representatives of Acrylic are registered representatives and directors of Brooklight Place Securities. From time to time, he may offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. The firm expects that clients to whom it offers advisory services may also be clients for whom Mr. Truhlar acts as a Registered Representative. Clients are instructed that the fees paid to Acrylic for advisory services are separate and distinct from the commissions earned for placing the client in commissionable products as a Registered Representative. Clients to whom Acrylic offers advisory services are informed that they are under no obligation to use Mr. Truhlar or any of our affiliated persons or entities Registered Representative services and may use the Broker Dealer and Registered Representative of their choice. Clients have the right to decide on the act of that insurance agent recommendation and have the right to choose the professional to do so.

Mr. Truhlar is Chief Distribution officer of Brokers Alliance Inc., (BA) an insurance wholesaling company. In his role Mr. Truhlar is responsible for overseeing distribution and operations for the

company. BA at times will refer an insurance agent who is also an advisor to Acrylic Financial, Inc (AF) for a potential affiliation of that advisor to the firm. BA at times will also refer insurance agents who are looking to become a registered Investment Adviser Representative to the firm for potential affiliation. Advisors of AF may also have an outside affiliation through a separate agency (or individually as an agent) for the placement of insurance products. The agency or individual is licensed as an independent contractor of the insurance company and places insurance products directly with the insurance company of their choice. Insurance Marketing Organizations (IMO) exists within this independent structure to provide a distribution channel on behalf of the insurance companies. In the event an independent agent elects to partner with the IMO BA, BA will be compensated direct from the insurance company. Mr. Truhlar receives salary and bonus from BA and therefore a conflict of interest may occur. This conflict is mitigated as independent agents may work with any insurance company and any IMO of their choosing, one of which may be BA. The commission structure built into insurance products is predetermined by the insurance companies and is not altered by the IMO. The product purchased by the client is issued by the insurance company and is no way altered by the IMO or the insurance agent. Furthermore, the client has no obligation to do business with the advisor/agent. Acrylic always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any representative of Acrylic in such individuals outside capacities.

Mr. Truhlar is the chief financial officer for Launch Financial, LLC. Launch Financial is a consulting company to insurance companies for product development. This could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed. 1-2 hours per month are spent on this activity.

Mr. Truhlar is General Partner of Acrylic Capital Management, LLC, the General Manager of Acrylic Explorer Fund LP, a hedge fund. Acrylic will recommend investments in this private fund to those clients for which investment in the fund is suitable. Acrylic will recommend investments in this private fund to those clients for which investment in the fund is suitable. This presents a conflict of interest in that Acrylic or its related persons may receive more compensation from investment in the fund than from other investments. Nevertheless, Acrylic acts in the best interest of the client consistent with its fiduciary duties and clients are not required invest in the private fund if they do not wish to do so.

Commissions are not Acrylic's primary source of compensation for advisory services. Advisory fees that are charged to clients are not reduced to offset the commissions or markups on securities or investment products recommended to clients. Acrylic and its supervised persons accept compensation for the sale of securities or other investment products

David Racich is CEO of Brokers Alliance, Inc. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is Founder/CEO of Integrated Io, LLC. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is Founder/CEO of Life's Best Insurance. Life's Best Insurance is a digital online platform that offers life insurance to retail consumers. David Racich has no interaction with retail clients. David Racich is an investor in Brooklight Place Securities and sits on the Board of Directors. David Racich has no contact with retail clients of any nature. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is a Board member of Brooklight Place Securities, Inc. David Racich is an investor in Brooklight Place Securities and sits on the Board of Directors. He does not have contact with retail clients of any nature. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is Founder/CEO of Launch Financial, LLC. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is Founder/CEO of BDR Holding Group. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is Founder/CEO of Emerson Art Gallery, LLC. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is Partner of TRAC Enterprises LLC. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is Partner of Shadow #5 LLC. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

Scott McLaine is a senior financial trainer and personality on training videos at BrightPhoenix Management, LLC.

Scott McLaine works as a managing partner at Tax Strategy, Planning, & LoopHole Review and Related Advice.

David Lewis Horseman Jr. is the owner of Horseman Solutions LLC.

Amy Esplin White works part time on HR related projects for Provider Health Solutions.

Ortis Milfort Pyronneau is an accountant, tax consultant and a certified mediator. From time to time, he will offer clients advice or products from this activity. Acrylic Financial, Inc. always acts in the best interest of the client. Clients are in no way required to utilize the services of any representative of Acrylic Financial, Inc. in their capacity as an accountant.

Alan Tin-Lo Chu is an accountant. From time to time, he will offer clients advice or products from this activity. Acrylic Financial, Inc. always acts in the best interest of the client. Clients are in no way required to utilize the services of any representative of Acrylic Financial, Inc. in their capacity as an accountant.

Alan Tin-Lo Chu is a real estate broker or dealer. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Acrylic Financial, Inc. always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Acrylic Financial, Inc. in their capacity as a real estate dealer or broker.

Alan Tin-Lo Chu is the president of CF Home Loans LLC.

Alan Tin-Lo Chu is a president at Mortgage Brokerage.

Leroy Isbell is a certified signing agent to secure signing of loan documents by borrowers for title companies.

Leroy Isbell is a registered tax preparer with the IRS. Complete tax returns for a fee for general public.

Leroy Isbell has been a wrestling official for 30 years.

Marvin Phillip Caldwell, Jr. works as a benefits counselor at Trion Group, a Marsh & McLennan Agency.

All material conflicts of interest under California Code of Regulations Section 260.238(k) are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonable expected to impair the rendering of unbiased and objective advice.

<b>D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections</b>
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Acrylic may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Clients will pay Acrylic its standard fee in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between Acrylic and each third-party advisor. The fees will not exceed any limit imposed by any regulatory agency. Acrylic will always act in the best interests of the client, including when

determining which third-party investment adviser to recommend to clients. Acrylic will ensure that all recommended advisers are licensed or notice filed in the states in which Acrylic is recommending them to clients.

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

### **A. Code of Ethics**

Acrylic has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Acrylic's Code of Ethics is available free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

Mr. Truhlar is General Partner of Acrylic Capital Management, LLC, the General Manager of Acrylic Explorer Fund LP, a hedge fund. Acrylic will recommend investments in this private fund to those clients for which investment in the fund is suitable.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of Acrylic may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Acrylic to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions create a conflict of interest. Acrylic will always document any transactions that could be construed as conflicts of interest and will never engage in trading front runs or operates to the client's disadvantage when similar securities are being bought or sold.

Acrylic will actively monitor all IAR's personal investment accounts, and maintain a restricted security list. Any securities on the restricted list (which are those [Acrylic uses in its] models for clients) are flagged and reviewed to confirm that no trading occurred on or near the time the Acrylic models were traded (which is monthly).

### **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of Acrylic may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Acrylic to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may

create a conflict of interest; however, Acrylic will never engage in trading front runs or it operates to the client's disadvantage if representatives of Acrylic buy or sell securities at or around the same time as clients.

Acrylic will actively and automatically monitor all IAR's personal investment accounts, and maintain a restricted security list. Any securities on the restricted list (which are those [Acrylic uses in its] models for clients) are flagged and reviewed to confirm that no trading occurred on or near the time the Acrylic models were traded (which is monthly). The models used have two proprietary models that could be traded monthly based on momentum moving average signals. Acrylic will also have one passive asset allocated model.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

Custodians will be recommended based on Acrylic's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Acrylic may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Acrylic's research efforts.

Acrylic will require clients to use Charles Schwab & Co., Inc. Advisor Services, Interactive Brokers LLC and Mid Atlantic Clearing & Settlement Corporation.

#### ***1. Research and Other Soft-Dollar Benefits***

Acrylic has access to research, products, or other services from its broker/dealer in connection with client securities transactions ("soft dollar benefits") consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended, and may consider these benefits in recommending brokers. There can be no assurance that any particular client will benefit from any particular soft dollar research or other benefits. Acrylic benefits by not having to produce or pay for the research, products or services, and Acrylic will have an incentive to recommend a broker dealer based on receiving research or services. Clients should be aware that Acrylic's acceptance of soft dollar benefits may result in higher commissions charged to the client.

#### ***2. Brokerage for Client Referrals***

Acrylic receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

Acrylic will require clients to use a specific custodian to custody their account to execute transactions. Acrylic will require clients to use Charles Schwab & Co., Inc. Advisor Services, Interactive Brokers, and Mid Atlantic Clearing & Settlement Corporation. We believe that our client uses a required custodian based on the appropriate fees that are charged, there is a conflict of interest, as the broker-dealer is not an affiliate or related person of Acrylic. By directing brokerage, Acrylic may be unable to achieve most favorable execution of client transactions which could cost clients money in trade execution.

#### **B. Aggregating (Block) Trading for Multiple Client Accounts**

If Acrylic buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Acrylic would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy.

## **Item 13: Review of Accounts**

#### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client accounts for Acrylic's advisory services provided on an ongoing basis are reviewed at least monthly by each Investment adviser representative who is responsible for the client accounts, with regard to clients' respective investment policies and risk tolerance levels. Acrylic will annually engage with the client to review portfolio and to determine if any changes need to be made.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Charles Truhlar, Chief Compliance officer. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

#### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, Acrylic's services will generally conclude upon delivery of the financial plan.



### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client of Acrylic's advisory services provided on an ongoing basis will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written statement will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

## **Item 14: Client Referrals and Other Compensation**

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

Other than soft dollar disclosed in Item 12 above Acrylic does not receive any compensation for advisory services it provides clients.

Charles Schwab & Co., Inc. Advisor Services provides Acrylic with access to Charles Schwab & Co., Inc. Advisor Services' institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. Advisor Services retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Charles Schwab & Co., Inc. Advisor Services. Charles Schwab & Co., Inc. Advisor Services includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For Acrylic client accounts maintained in its custody, Charles Schwab & Co., Inc. Advisor Services generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Charles Schwab & Co., Inc. Advisor Services or that settle into Charles Schwab & Co., Inc. Advisor Services accounts.

Charles Schwab & Co., Inc. Advisor Services also makes available to Acrylic other products and services that benefit Acrylic but may not benefit its clients' accounts. These benefits may include national, regional or Acrylic specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Advisor Services. Other potential benefits may include occasional business entertainment of personnel of Acrylic by Charles Schwab & Co., Inc. Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist Acrylic in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of Acrylic's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to



service all or some substantial number of Acrylic's accounts. Charles Schwab & Co., Inc. Advisor Services also makes available to Acrylic other services intended to help Acrylic manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Charles Schwab & Co., Inc. Advisor Services may make available, arrange and/or pay vendors for these types of services rendered to Acrylic by independent third parties. Charles Schwab & Co., Inc. Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Acrylic. Acrylic is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

## **B. Compensation to Non - Advisory Personnel for Client Referrals**

Acrylic may, via written arrangement, retain third parties to act as solicitors for Acrylic's investment management services. All compensation with respect to the foregoing will be fully disclosed to each client to the extent required by applicable law. Acrylic will ensure each solicitor is properly registered in all appropriate jurisdictions. All such referral activities will be conducted in accordance with Rule 206(4)-1 under the Advisers Act, where applicable

## **Item 15: Custody**

Acrylic does not accept or maintain physical custody of client funds or securities. However, when advisory fees are deducted directly from client accounts at client's custodian, Acrylic will be deemed to have custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction from the custodian and Acrylic respectively, and they should carefully review those statements for accuracy. Clients are advised to compare the statements they receive from custodians to the invoices ones that they receive from Acrylic. Notify Acrylic promptly of any discrepancies. Clients will also receive monthly invoices and quarterly performance reports from Acrylic.

Each client of Acrylic's advisory services provided on an ongoing basis will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written statement will come from the custodian.

Acrylic may also be deemed to have custody over the funds and securities invested in pooled investment vehicles it that Acrylic manages.

## **Item 16: Investment Discretion**

Acrylic provides discretionary and non-discretionary investment advisory services to clients. For non-discretionary account we will be calling you for any trade we make so that you can authorize the trade. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Acrylic generally manages the client's account and makes

investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, Acrylic's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to Acrylic).

## **Item 17: Voting Client Securities (Proxy Voting)**

Acrylic will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security. For any questions, please contact Acrylic or the issuer.

## **Item 18: Financial Information**

### **A. Balance Sheet**

Acrylic neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither Acrylic nor its management has any financial condition that is likely to reasonably impair Acrylic's ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

Acrylic has not been the subject of a bankruptcy petition in the last ten years.