



TrueFocus Financial Partners, LLC (“TFFP”) is registered with Rhode Island and Massachusetts Securities Divisions as an investment adviser. Our services and compensation structure differ from a registered broker-dealer, and it is important for you to understand the differences between those structures. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

### **What investment services and advice can you provide me?**

We are a fee-only wealth management firm that offers investment advisory and financial planning services to retail clients. Our firm provides continuous advice regarding your investments based on your individual needs. Through personal, focused discussions, we establish your particular goals and objectives. We develop an investment plan with an asset allocation target, and create and manage a portfolio based on those allocation targets. We will also review and discuss your prior investment history, as well as family composition and background. Account supervision is guided by your stated objectives (e.g., maximum capital appreciation, growth, income, or growth, and income), as well as risk tolerance and tax considerations. We primarily recommend investments in stocks, bonds, mutual funds, ETFs, U.S. government and municipal securities, and cash and cash equivalents. We may also provide advice regarding investments held in your portfolio at the inception of our advisory relationship.

Under our investment management services, your investment accounts will be monitored and reviewed regularly on at least an annual basis by our firm. We will provide advice to you regarding the investments and allocation of your accounts to ensure they are positioned appropriately based on your goals and objectives.

Through our investment management service, we give you the option to grant us the authority to purchase or sell securities without obtaining your consent in advance (**Discretionary Authority**), or to require that we obtain your consent prior to purchasing or selling any securities from your account(s) (**Non-discretionary Authority**).

### **Limited Investment Offerings:**

We primarily recommend investments in stocks, bonds, mutual funds, ETFs, U.S. government and municipal securities, and cash and cash equivalents. We may also provide advice regarding investments held in your portfolio at the inception of our advisory relationship.

**Account Minimums and Other Requirements:**

Our minimum portfolio size requirement is \$1,000,000 to open or maintain a relationship under our management. Our minimum annual fee for our Wealth Management Service is \$10,000. TFFP may reduce or waive the minimum account size requirement and account fee minimum on a case-by-case basis.

For **Additional Information** regarding the services we make available to you, please review Item 4, 7, and 13 of our Form ADV Part 2A.

**Ask your Adviser:**

1. ***“Given my financial situation, should I choose an investment advisory service? Why or why not?”***
2. ***“How will you choose investments to recommend to me?”***
3. ***“What is your relevant experience, including your licenses, education and other qualifications, and what do these qualifications mean?”***

**What fees will I pay?**

Our wealth management fee schedule is simple, transparent, and is either set at our minimum fee for service or based on a percentage of the assets managed. We will deduct fees directly from your managed account (asset-based fees) on a quarterly basis.

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which you may incur. Additional fees you may pay include certain charges imposed by custodians such as custodial fees, deferred sales charges, or other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. We do not receive any portion of these fees.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

***Ask your Adviser: “Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?”***

**What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

*When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.*

- We are paid for wealth management services based on a percentage of your assets under management. Therefore, the more assets there are in your advisory account, the more you will pay in fees. This creates an incentive to encourage you to increase the assets in your account. This is a conflict of interest. However, we mitigate this by ensuring all recommendations and investment decisions we make are in your best interest.

***Ask your Adviser: “How might your conflicts of interest affect me, and how will you address them?”***

**Additional Information**

- Receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor’s choice of Charles Schwab for custody and brokerage services. This conflict of interest is mitigated as Advisor regularly reviews the factors used to select custodians to ensure our recommendation is appropriate.
- Our firm, its access persons, or its related persons may buy or sell securities for themselves at or around the same time as they buy or sell securities for Clients’ account(s). To address this conflict, it is our policy that neither our firm or access persons shall have priority over Clients’ accounts in the purchase or sale of securities.
- Our firm, its access persons, and its related persons may buy or sell securities similar to, or different from, those we recommend to Clients. In an effort to reduce or eliminate certain conflicts of interest, our Code of Ethics may require that we restrict or prohibit access persons’ transactions in specific reportable securities.

**How do your financial professionals make money?**

TFFP owners share in firm profits and are not paid commissions or compensated for their recommendations.

**Do you or your financial professionals have legal or disciplinary history?**

No. You can visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

***Ask your Adviser: As a financial professional, do you have any disciplinary history? For what type of conduct?***

**For additional information** about our services, visit our website. If you would like additional, up-to-date information or a copy of this disclosure, please call 617-830-3009.

***Ask your Adviser: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?***

#### **SUMMARY OF MATERIAL CHANGES**

The Advisor has amended their minimum fee for services. For more information about these requirements, please see “Account Minimums and Other Requirements” on page 1.