

# **True Link Financial Advisors, LLC**

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**March 14, 2018**

This Brochure provides information about the qualifications and business practices of True Link Financial Advisors LLC. If you have any questions about the contents of this Brochure, please contact us at 866-984-8576 or via email [advisors@truelinkfinancial.com](mailto:advisors@truelinkfinancial.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.

True Link Financial Advisors LLC (“True Link”) is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information that you may use to determine whether to hire or retain them.

Additional information about True Link is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by using a unique identifying number, known as a CRD number. The CRD number for True Link is 281870. The SEC’s web site also provides information about any persons affiliated with True Link who are registered, or are required to be registered, as Investment Adviser Representatives of True Link.

## **Item 2 – Material Changes**

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There were no material changes to the business since our last annual amendment filing on March 31, 2017.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year which is December 31st. We will provide other ongoing disclosure information about material changes as they occur. We will also provide you with information on how to obtain the complete Brochure. Currently, our Brochure may be requested at any time, without charge, by contacting George Guerrero at 866-984-8576.

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## **Item 4 – Advisory Business Introduction**

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### **Our Advisory Business**

True Link Financial Advisors LLC (“True Link”) is a Registered Investment Adviser (“Adviser”) which offers investment advice regarding securities and other financial services to our clients. We are registered through and regulated by the State of California – Securities Regulation Division.

We provide investment advice through Investment Adviser Representatives (“Advisor”) associated with us. These individuals are appropriately licensed, qualified, and authorized to provide advisory services on our behalf.

True Link is a subsidiary of True Link Financial. True Link is indirectly owned by Kai Stinchcombe. George Guerrero serves as Chief Compliance Officer and as the investment adviser representative. We provide asset management, financial planning, and financial consulting services to individuals, high net worth individuals, trusts, estates, and charitable organizations. There is a minimum fee of \$1,000 which may be negotiable based upon certain circumstances.

We are committed to the precept that by placing the client’s interests first, we will add value to the asset management process and earn the client’s trust and respect. We value long term relationships with our clients whom we regard as strategic partners in our business.

We do participate in wrap fee programs, offered either by True Link or Envestnet Asset Management, Inc. For more information regarding these services, please refer to our ADV Part 2A Appendix 1 brochure.

### **Services**

We provide various asset management and financial planning services.

### **Asset Management**

Asset management is the professional management of securities (stocks, bonds and other securities) and assets (e.g., real estate) in order to meet your specified investment goals. With an Asset Management Account, you engage us to assist you in developing a custom-tailored portfolio designed to meet your unique investment objectives. The investments in the portfolio account may include mutual funds, exchange traded funds, stocks, bonds, equity options, futures, etc.

We provide comprehensive financial planning as an integral part of our asset management services. We will meet with you to discuss your financial circumstances, investment goals and objectives, capital and disbursement needs, and to determine your risk tolerance. Creating a financial plan is essential in assessing your financial situation and, as such, is combined with our asset management services. We do not create financial plans on an a la crate basis for a fee. When creating a financial plan, a conflict of interest exists wherein our recommendations may result in an advisory fee paid to us. You are under no obligation to act on the recommendations made in the financial plan and if you decide to act on the recommendations you are under no obligation to effect the transaction with us.

Financial planning is a comprehensive relationship which incorporates many different aspects of your financial status into an overall plan that meets your goals and objectives. The financial planning relationship consists of face-to-face meetings and ad hoc meetings with you and or your other advisors (attorneys, accountants, etc.) as necessary.

Based on the information you share with us, we will analyze your situation and recommend an appropriate asset allocation or investment strategy. Our recommendations and ongoing management are based upon your investment goals and objectives, risk tolerance, and the investment portfolio you have selected. We will monitor the account, trade as necessary, and communicate regularly with you. Your circumstances shall be monitored in quarterly and annual account reviews. These reviews will be conducted in person, by telephone conference, and/or via a written inquiry/questionnaire. We will work with you on an ongoing basis to evaluate your asset allocation as well as rebalance your portfolio to keep it in line with your goals as necessary. We will be reasonably available to help you with questions about your account.

We will:

- Review your present financial situation
- Monitor and track assets under management
- Provide portfolio statements, periodic rate of return reports, asset allocation statement, rebalanced statements as needed
- Advise on asset selection
- Determine market divisions through asset allocation models
- Provide research and information on performance and fund management changes
- Build a risk management profile for you
- Assist you in setting and monitoring goals and objectives
- Provide personal consultations as necessary upon your request or as needed.

You are obligated to notify us promptly when your financial situation, goals, objectives, or needs change.

You shall have the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, exchanged traded funds, stocks or other securities. These restrictions may be a specific company security, industry sector, asset class, or any other restriction you request.

Under certain conditions, securities from outside accounts may be transferred into your advisory account; however, we may recommend that you sell any security if we believe that it is not suitable for the current recommended investment strategy. You are responsible for any taxable events in these instances. Certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is not indicative of future results.

We can also work with you, in a consulting capacity, to create an Investment Policy Statement (IPS) that will serve as the roadmap to guide your wealth management program. Your IPS will incorporate many

different aspects of your financial status into an overall plan designed to meet your goals and objectives. We will create a formal IPS and deliver it to you upon completion. We use your specific investment objectives and goals to create your customized IPS. We will create a formal IPS and deliver it to you upon completion.

If you decide to implement our recommendations, we will help you open a custodial account(s). The funds in your account will generally be held in a separate account, in your name, at an independent custodian, and not with us. We recommend using Charles Schwab & Co., Inc. (“Schwab”), Member FINRA/SIPC; however, you may use any custodian you wish.

You will enter into a separate custodial agreement with the custodian which authorizes the custodian to take instructions from us regarding all investment decisions for your account. We will select the securities bought and sold and the amount to be bought and sold, within the parameters of the objectives and risk tolerance of your account. You will be notified of any purchases or sales through trade confirmations and statements that are provided by the custodian. These statements list the total value of the account, itemize all transaction activity, and list the types, amounts, and total value of securities held. You will at all times maintain full and complete ownership rights to all assets held in your account, including the right to withdraw securities or cash, proxy voting and receiving transaction confirmations.

We may also provide you with a quarterly performance statement starting at the end of the first full calendar quarter after signing the Client Advisory Agreement. These statements give you additional feedback regarding performance, educate you about our long-term investment philosophy, and describe any changes in current strategy and allocation along with the reasons for making these changes.

We manage assets on both discretionary and non-discretionary basis. If we manage on a discretionary basis, it means you have given us the authority to determine the following with/without your consent:

- Securities to be bought or sold for your account
- Amount of securities to be bought or sold for your account
- Broker-dealer to be used for a purchase or sale of securities for your account
- Commission rates to be paid to a broker or dealer for your securities transaction.

If you have not given us the authority to manage your account on a discretionary basis, then we cannot trade in your account without your express permission.

Trading may be required to meet initial allocation targets, after substantial cash deposits that require investment allocation, and/or after a request for a withdrawal that requires liquidation of a position. Additionally, your account may be rebalanced or reallocated periodically in order to reestablish the targeted percentages of your initial asset allocation. This rebalancing or reallocation will occur on the schedule we have determined together. You will be responsible for any and all tax consequences resulting from any rebalancing or reallocation of the account. We are not tax professionals and do not give tax advice. However, we will work with your tax professionals to assist you with tax planning.

We are available during normal business hours either by telephone, fax, email, or in person by appointment to answer your questions.

### **Third Party Money Managers**

We offer the “Private Wealth Management Program” through an agreement with Envestnet Asset Management, Inc. (“Envestnet” or “Platform Manager”), an independent management program provider that is not affiliated with us. Envestnet sponsors and administers the Private Wealth Management Program. In addition to this brochure, you will receive, and should review, a copy of Envestnet’s Form ADV Part 2A, Appendix 1 Wrap Fee Program Brochure (the “Envestnet Disclosure Brochure”), which contains additional information regarding Envestnet’s services, processes, and policies.

The following separate investment management solutions are available to our clients as part of the Private Wealth Management Program:

- Separately Managed Accounts Solution (“SMA”) – provides investors with the opportunity to select from a researched and approved list of equity and fixed income money managers that are compatible with the client’s needs.
- United Managed Account Solution (“UMA”) – enables the Advisor to construct a single portfolio by selecting the specific, underlying investment vehicles and asset allocations. The UMA combines the investment expertise of globally prominent asset managers, ETFs and Mutual Funds into a single portfolio and custodial account. This investment strategy delivers the benefits of a traditional separately managed account in a single fully-diversified portfolio and provides the freedom to choose the best solutions available to suit investor needs.
- Advisor as Portfolio Manager Solution (“Advisor Solution”) - offers access to portfolios comprised of products chosen directly by the Advisor. These model portfolios are constructed and rebalanced directly by the Advisor.
- Fund Strategist Portfolios Program - Access and comprehensive program support of Envestnet’s mutual fund and exchange-traded fund asset allocation and wrap product program. The Third-Party Strategist Program offers individual investors an actively managed portfolio comprised of carefully selected mutual funds or exchange-traded funds managed by independent management firms.

### **Management By Us Vs. Envestnet**

At the beginning of our asset management relationship, we will review your financial goals and objectives, which includes the creation of a financial plan. Based on our assessment and your input, we will present you options including our investment advisor representatives selecting individual investments (mutual funds, ETFs, stocks, bonds, etc.) for you. Alternatively, we may recommend that you contract with Envestnet to utilize 3<sup>rd</sup> party money management or allow our investment advisor representatives to use their platform to create model portfolios for you. In either case, we will fully disclose all fees charged and in cases where you decide to use Envestnet we will charge less for our fee to offset the fee charged by them.

After consultation with you the Client, we may choose to use another third-party money manager. We may receive a fee from these third-party money managers for the referral. Fee sharing agreements, between us and the third-party money manager are disclosed at the time we recommend the third-party money manager.

One of the more advanced programs that we may offer to you, is a Turn-Key Management Platform (TAMP). TAMPs are wrap programs where a client generally pays a fee that includes management, brokerage, performance reporting, and certain other services. Client portfolios can have multiple managers managing assets together in a single account or may have individual managers assigned to manage a particular asset class in a separate, segregated account.

A full description of services and fees can be found in Envestnet's ADV Part 2 Appendix 1.

### **Held Away Account Services**

We provide an additional service for accounts not under our investment management services where it is not possible for us to enter trades through our normal custodian. These are primarily company retirement accounts (401ks) and annuities. We meet with clients regularly to review current holdings in these accounts, suggest appropriate trades, which are then transacted by the clients, monitor the accounts and provide statements and performance reporting on an ongoing basis.

### **Wrap Fee**

We may provide asset management through the True Link Wrap Fee Program. Please see the True Link's Form ADV Part 2A, Appendix 1 Wrap Fee Brochure for a description of services and fees.

### **Assets Under Management**

As of December 31, 2017, we had a total of \$22,800,000 in discretionary assets under management and \$23,400,000 in non-discretionary assets under management.

## **Item 5 – Fees and Compensation**

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We provide asset management, financial planning, and financial consulting services for a fee.

Either party may terminate the relationship with a thirty (30) day written notice. Upon termination of any account, any prepaid fees that are in excess of the services performed will be promptly refunded to you. Any fees that are due, but have not been paid, will be billed to you and are due immediately.

### **Asset Management Fee Schedule**

Our minimum fee is \$1,000 which may be negotiable based upon certain circumstances. The fee charged is based upon the amount of money you invest. Multiple accounts of immediately-related family members, at the same mailing address, may be considered one consolidated account for billing purposes. Fees are charged monthly, in arrears. Payments are due and will be assessed on the last day of each month, based on the average daily balance of the account under management for the ending month and will be calculated as follows:

Percentage	Portfolio Size (AUM)
1.65%	All Portfolio Sizes
Fixed Fee Not to Exceed 1.65% of AUM	\$1,000+

The fees shown above are annual fees and may be negotiable based upon certain circumstances. No increase in the annual fee shall be effective without prior written notification to you. We believe our advisory fee is reasonable considering the fees charged by other investment advisers offering similar services/programs.

In certain circumstances, advisory fees and account minimums may be negotiable based upon prior relationships as well as related account holdings. A flat fee may also be negotiated as long as it does not exceed the fee schedule above. If a flat fee is negotiated, that fee will be listed in the Asset Management Fee Agreement and Disclosure Statement. You may also pay additional advisory fees to a third-party money manager depending upon which manager you select. Our fees will not be based upon a share of capital gains or capital appreciation of the funds or any portion of your funds.

Your account at the custodian may also be charged for certain additional assets managed for you by us but not held by the custodian (i.e. variable annuities, mutual funds, 401(k)s).

The fees we charge can be deducted directly from your account at the custodian. We will instruct the custodian to deduct the fees from your account at the end of the month. This fee will show up as a deduction on your next account statement from the custodian.

If you do not want us to charge your account for the fee, you may pay the fee directly to us. We will send you an invoice detailing the fee calculation. Fees are due in full 15 days after receipt of the invoice.

### **Third Party Fees**

Our fees do not include brokerage commissions, transaction fees, and other related costs and expenses. You may incur certain charges imposed by custodians, third party investment companies and other third parties. These include fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds, money market funds and exchange-traded funds (ETFs) also charge internal management fees, which are disclosed in the fund's prospectus. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. Certain strategies offered by us may involve investment in mutual funds and/or ETFs. Load and no load mutual funds may pay annual distribution charges, sometimes referred to as "12(b)(1) fees". These 12(b)(1) fees come from fund assets, and thus indirectly from clients' assets. We do not receive any compensation from these fees. All of these fees are in addition to the management fee you pay us. You should review all fees charged to fully understand the total amount of fees you will pay. Services similar to those offered by us may be available elsewhere for more or less than the amounts we charge. Our brokerage practices are discussed in more detail under Item 12 – Brokerage Practices.

## **Held-Away Asset Fees**

We charge an annual fee for services provided to these held away accounts, which is paid on a quarterly basis. Fees are based on the assets within these accounts, and are charged at 50 bps, paid quarterly, according to the valuation of the accounts at the close of the quarter as valued by the account custodian.

## **Item 6 – Performance Based Fee and Side by Side Management**

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We do not charge any performance-based fees. These are fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7 – Types of Client(s)**

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We provide asset management, financial planning and consulting to trusts, individuals, high net worth individuals, estates and charitable organizations.

Our minimum fee is \$1,000 which may be negotiable based upon certain circumstances

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

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### **Methods of Analysis**

We use Fundamental and Technical analysis as part of our overall investment management discipline; the implementation of these analyses as part of our investment advisory services to you may include any, all or a combination of the following:

#### **Fundamental Analysis**

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the underlying factors that affect a company's actual business and its future prospects. Fundamental analysis is about using real data to evaluate a security's value. It refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

The end goal of performing fundamental analysis is to produce a value that we can compare with the security's current price, with the aim of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short).

#### **Technical Analysis**

Technical Analysis is a technique that attempts to determine a security's value by developing models and trading rules based upon price and volume transformation. Technical analysis assumes that a market's price reflects all relevant information so the analysis focuses on the history of a security's trading behavior rather than external drivers such as economic, fundamental and news events. The practice of technical analysis incorporates the importance of understanding how market participants perceive and act upon relevant information rather than focusing on the information itself. Ultimately, technical analysts develop

trading models and rules by evaluating factors such as market trends, market participant behaviors, supply and demand and pricing patterns and correlations.

As with other types of analysis, the predictive nature of technical analysis can vary greatly; models and rules are often modified and updated as new patterns and behaviors develop. Past performance is not an indicator of future return.

## **Asset Allocation**

True Link defines a constant-weighting portfolio with broad market exposure across selected risk tolerances. We employ a top down approach that begins with asset class exposure across geographies and investment types and apply weightings to those asset classes using cost-efficient investment options. Our models are designed to meet the objectives of a wide array of investors, each having their own inclinations with regards to risk and reward, and can be tailored to individual preference. Typically, the investment goals of our customers are more prudential in nature, and are geared to adequately meet the financial needs of beneficiaries, accounting for inflation, while mitigating volatility.

Our portfolios are strategic in structure. They are not designed to place a tactical view on any specific segment of the market. We adhere to a long-term, disciplined approach to managing client assets as we believe it delivers the most suitable combination of value and diligence for our target clientele.

We work with our clients to set investment objectives that are timed and scaled to their support needs, and make adjustments as conditions, goals, and circumstances evolve.

## **Investment Strategies**

In order to perform this analysis, we use many resources, such as:

- Morningstar
- Financial newspapers and magazines (e.g. Wall Street Journal, Forbes, etc.)
- Annual reports, prospectuses, filings
- Company press releases and websites

The investment strategies we use to implement any investment advice given to you include, but are not limited to:

- Long term purchases -securities held at least a year

However, certain market conditions may create the need for more frequent trading of securities by us or a third-party money manager on your behalf. More frequent trading may result in diminished returns because of higher transactions costs and resulting taxes.

## **Risk of Loss**

We cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk. Investing in securities involves a risk of loss that you should be prepared to bear. You need to understand that investment decisions made for your account by us are subject to various market, currency, economic,

political and business risks. The investment decisions we make for you will not always be profitable nor can we guarantee any level of performance.

A list of all risks associated with the strategies, products and methodology we offer are listed below:

### **Bond Fund Risk**

Bond funds generally have higher risks than money market funds, largely because they typically pursue strategies aimed at producing higher yields of the risks associated with bond funds include:

- Call Risk - The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.
- Credit Risk — the possibility that companies or other issuers whose bonds are owned by the fund may fail to pay their debts (including the debt owed to holders of their bonds). Credit risk is less of a factor for bond funds that invest in insured bonds or U.S. Treasury bonds. By contrast, those that invest in the bonds of companies with poor credit ratings generally will be subject to higher risk.
- Interest Rate Risk — the risk that the market value of the bonds will go down when interest rates go up. Because of this, you can lose money in any bond fund, including those that invest only in insured bonds or Treasury bonds.
- Prepayment Risk — the chance that a bond will be paid off early. For example, if interest rates fall, a bond issuer may decide to pay off (or "retire") its debt and issue new bonds that pay a lower rate. When this happens, the fund may not be able to reinvest the proceeds in an investment with as high a return or yield.

### **Fundamental Analysis Risk**

Fundamental analysis, when used in isolation, has a number of risks:

- There are an infinite number of factors that can affect the earnings of a company, and its stock price, over time. These can include economic, political, and social factors, in addition to the various company statistics.
- The data used may be out of date.
- It is difficult to give appropriate weightings to the factors.
- It assumes that the analyst is competent.
- It ignores the influence of random events such as oil spills, product defects being exposed, and acts of God and so on.

### **Exchange Traded Fund ("ETF") Risk**

Most ETFs are passively managed investment companies whose shares are purchased and sold on a securities exchange. An ETF represents a portfolio of securities designed to track a particular market segment or index. ETFs are subject to the following risks that do not apply to conventional funds:

- The market price of the ETF's shares may trade at a premium or a discount to their net asset value;
- An active trading market for an ETF's shares may not develop or be maintained; and

- There is no assurance that the requirements of the exchange necessary to maintain the listing of an ETF will continue to be met or remain unchanged

### **Mutual Funds Risk**

The following is a list of some general risks associated with investing in mutual funds.

- Country Risk - The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.
- Currency Risk -The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.
- Income Risk - The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.
- Industry Risk - The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.
- Inflation Risk - The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation-adjusted returns.
- Manager Risk -The possibility that an actively managed mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.
- Market Risk -The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- Principal Risk -The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

### **Stock Fund Risk**

Overall "market risk" poses the greatest potential danger for investors in stocks funds. Stock prices can fluctuate for a broad range of reasons, such as the overall strength of the economy or demand for particular products or services.

### **Technical Analysis risk**

- Technical analysis is derived from the study of market participant behavior and its efficacy is a matter of controversy.
- Methods vary greatly and can be highly subjective; different technical analysts can sometimes make contradictory predictions from the same data.
- Models and rules can incur sufficiently high transaction costs.

### **Overall Risks**

Clients need to remember that past performance is no guarantee of future results. All funds carry some level of risk. You may lose some or all of the money you invest, including your principal, because the

securities held by a fund goes up and down in value. Dividend or interest payments may also fluctuate, or stop completely, as market conditions change.

Before you invest, be sure to read a fund's prospectus and shareholder reports to learn about its investment strategy and the potential risks. Funds with higher rates of return may take risks that are beyond your comfort level and are inconsistent with your financial goals.

While past performance does not necessarily predict future returns, it can tell you how volatile (or stable) a fund has been over a period of time. Generally, the more volatile a fund, the higher the investment risk. If you'll need your money to meet a financial goal in the near-term, you probably can't afford the risk of investing in a fund with a volatile history because you will not have enough time to ride out any declines in the stock market.

## **Item 9 – Disciplinary Information**

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Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. We do not have any information to disclose concerning True Link or any of our investment advisors. We adhere to high ethical standards for all advisors and associates.

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

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Neither True Link nor any of its management persons are registered as a broker-dealer or registered as a representative of a broker-dealer, nor does it have any pending application to register. In addition, neither True Link nor its management persons are affiliated with any broker-dealer. Further neither True Link nor any management persons are registered, or have an application pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

### **Other Financial Industry Affiliations**

True Link has the following outside business activities and/or affiliations to disclose:

True Link Financial, the parent company of True Link Financial Advisors LLC, offers pre-paid debit card services. These services are offered primarily to seniors, adults with disabilities, and vulnerable individuals. Customers of our parent company may be referred or become aware of our investment advisory services and choose to use us; however, there is no referral fee paid. Kai Stinchcombe is the acting CEO of True Link Financial and also serves as an Investment Adviser Representative for True Link. This creates a conflict of interest to the extent that our parent company may earn fees from a client using their credit card services who also enters into an advisory agreement with us. We disclose this relationship to all advisory clients and explain that they are free to use our services or any other investment advisor of their choice.

True Link Financial also offers a software platform, called True Link Advisor Platform. We partner with third-party financial institutions who will use our software platform to place clients into an investment/disbursement model. We are compensated for this service through a subscription fee.

We may also offer our software platform to other financial institutions who will refer clients to us through the platform. We will pay a referral fee to these institutions for the referral.

Finally, a company may purchase a license to use our software platform in their retail system. We would be compensated through the purchase of the license.

### **Selection of Other Advisers**

True Link ensures that any others advisors recommended to you are properly licensed or registered as an investment adviser. True Link Advisors will be compensated by the third-party manager(s) from the advisory fees collected from the client. Details of these fees are/will be described in Item 5 – Fees and Compensation. Fees are generally 1.00% per annum. This causes a conflict of interest in recommending certain third party managers since we may receive compensation for referring clients to these vendors. In order to mitigate this conflict of interest, we require all IARs to inform the client that they are under no obligation to implement any recommendations made by us or the third party manager.

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

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### **General Information**

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

### **Participation or Interest in Client Accounts**

Our Compliance policies and procedures prohibit anyone associated with True Link from having an interest in a client account or participating in the profits of a client’s account without the approval of the CCO.

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice or course of business
- Engaging in any manipulative practices

Clients and prospective clients may request a copy of the firm's Code of Ethics by contacting the CCO.

## **Personal Trading**

We may recommend securities to you that we will purchase for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders after your orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade Order (specifying each participating account) and its allocation. Completed Orders will be allocated as specified in the initial trade order. Partially filled Orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

True Link has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of "Access Persons". The policy requires that an Access Person of the firm provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Adviser selects; provided, however that at any time that the Adviser has only one Access Person, he or she shall not be required to submit any securities report described above.

We have established the following restrictions in order to ensure our fiduciary responsibilities regarding insider trading are met:

- No securities for our personal portfolio(s) shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of Investment Advisory Representative(s) of True Link, unless the information is also available to the investing public on reasonable inquiry. In no case, shall we put our own interests ahead of yours.

## **Privacy Statement**

We are committed to safeguarding your confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your information. Our Privacy Policy is available upon request.

## **Conflicts of Interest**

True Link's advisors may employ the same strategy for their personal investment accounts as it does for its clients. However, advisors may not place their orders in a way to benefit from the purchase or sale of a security.

We prohibit advisors or any related person from recommending any security which the adviser or a related person has a material financial interest.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in your favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

We have disclosed all known material conflicts of interest within this document.

## **Item 12 – Brokerage Practices**

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### **Factors Used to Select Custodians**

We recommend Schwab for clients based on relatively low transaction fees, access to desired securities, trading platforms, and support services.

### **Soft Dollars**

Schwab and other third party managers may provide us with certain brokerage and research products and services that qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act"). These research products and/or services will assist the Advisor in its investment decision making process. Such research generally will be used to service all of the Advisor's clients, but brokerage commissions paid by the client may be used to pay for research that is not used in managing the client's account. The account may pay to a broker-dealer a commission greater than another qualified broker-dealer might charge to effect the same transaction where the Advisor determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received.

Because soft dollar benefits could be considered to provide a benefit to the adviser that might cause the client to pay more than the lowest available commission without receiving the most benefit, they are considered a conflict of interest in recommending or directing custodial and third party managerial services. True Link mitigates these conflicts of interest through strong oversight of soft-dollar arrangements by the Chief Compliance Officer, in order to assure the soft dollar benefits serve the best interests of the client.

There may other benefits from recommending Schwab or other third party managers such as software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Other services may include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom True Link may contract directly. True Link may receive seminar expense reimbursements from product sponsors which may be based on the sales of products to their clients.

Soft dollar benefits may be proportionally allocated to any accounts that may generate different amounts of the soft dollar benefits.

## **Best Execution**

We have an obligation to seek best execution for you. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, reputation and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

## **Brokerage for Client Referrals**

In selecting and/or recommending broker-dealers, we do not take into consideration whether or not we will receive client referrals from the broker-dealer or third party.

## **Directed Brokerage**

Clients are permitted to use the custodian of their choosing. Not all advisory firms permit you to direct brokerage. If you elect to select your own broker-dealer or custodian and direct us to use them, you may pay higher or lower fees than what is available through our relationships. Generally, we will not negotiate lower rates below the rates established by the executing broker-dealer or custodian for this type of directed brokerage account, unless we believe that such rate is unfair or unreasonable for the size and type of transaction. In all instances, we will seek best execution for you.

## **Trading**

Transactions for each client account generally will be effected independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients' differences in prices and commission or other transaction costs. Under this procedure, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

Transactions placed in an asset management account by a third party manager will be executed through their broker-dealer or custodian. In determining best execution for these transactions, the third-party manager is looking at whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. While they look for competitive commission rates, they may not obtain the lowest possible commission rates for account transactions. The aggregation and allocation practices of mutual funds and third party managers that we recommend to you are disclosed in the respective mutual fund prospectuses and third party manager disclosure documents which will be provided to you.

## **Item 13 – Review of Accounts**

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### **Reviews**

Reviews will be conducted at least annually or as agreed to by us. Reviews will be conducted by the Chief Compliance Officer. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Generally, we will monitor for changes and shifts in the economy, changes to the management and structure of an equity or company in which client assets are invested, and market shifts and corrections.

### **Reports**

You will be provided with account statements reflecting the transactions occurring in your account at least quarterly. These statements may be written or electronic depending upon what you selected when you opened the account. You will be provided with confirmations for each securities transaction executed in the account. You are obligated to notify us of any discrepancies in the account(s) or any concerns you have about the account(s).

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

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We may also offer our software platform to other financial institutions who will refer clients to us through the platform. Pursuant to a written referral agreement between True Link and unaffiliated individuals and other parties (collectively “Solicitors”), Solicitors agree to refer prospective clients to True Link to participate in our investment management programs. The written agreement will identify the roles and responsibilities of the solicitor and True Link and the specific amount of the annual advisory fee to be paid to the solicitor. This fee compensates the Solicitor for referring clients to us, assisting in the enrollment of clients for participation in our programs, and facilitating communication between us and clients. The annual advisory fee charged to the client will not be affected if the client was introduced or referred by a solicitor. Through the Solicitors Written Disclosure Document, each client is made aware of the referral agreement prior to or at the time of entering into an advisory contract and acknowledges receipt of a current True Link’s Form ADV Part 2A. The advisory fee will be paid quarterly for so long as the client maintains an Investment Management Agreement with True Link and the solicitor’s agreement remains in-force. If at any time either agreement is terminated, the advisory fee payments to the solicitor will cease. We may also pay compensation as part of referral engagements with partnering law firms if they refer clients to us.

We may also be compensated by a third-party for the use of our True Link Advisory Platform through subscription fees. These fees will be paid pursuant to a subscription agreement. We will not provide any advisory services through this subscription agreement.

We may be compensated by a third-party for the purchase of our True Link Advisory Platform. We will not provide any advisory services. Under this purchase plan.

## **Item 15 – Custody**

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We do not have physical custody of any accounts or assets. However, we may be deemed to have custody of your account(s) if we have the ability to deduct your advisory fees from the custodian. We use Schwab as the custodian and/or broker-dealer for all your accounts. You should receive at least quarterly statements from the broker-dealer or custodian that holds and maintains your investment assets. We urge you to carefully review such statements and compare this official custodial record to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. If you notice any discrepancies, please contact True Link.

We do not debit the client fees directly from your advisory account. We send information to your custodian to debit your fees and to pay them to us. You authorized the custodian to pay us directly at the onset of the relationship.

## **Item 16 – Investment Discretion**

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We usually receive discretionary authority from you at the beginning of an advisory relationship to select the identity and amount of securities to be bought or sold. This information is described in the Advisory Agreement you sign with us. In all cases, however, this discretion is exercised in a manner consistent with your stated investment objectives for your account.

When selecting securities and determining amounts, we observe the investment policies, limitations and restrictions you have set. For registered investment companies, our authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Prior to assuming discretionary authority, clients must execute the Advisory Agreement. Execution of the Advisory Agreement grants us the authority to determine, without obtaining specific client consent, both the amount and the type of securities to be bought and sold to help achieve the client account objectives.

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

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As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. We may provide advice to you regarding your voting of proxies. The custodian will forward you copies of all proxies and shareholder communications relating to your account assets.

## **Item 18 – Financial Information**

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We are required to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to you, our client. We have not been the subject of any bankruptcy proceedings.

In no event shall we charge advisory fees that are both in excess of five hundred dollars and more than six months in advance of advisory services rendered.

## **Item 19 – Requirements for State Registered Advisers**

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### **Principals**

There are two firm principals of True Link, George Guerrero and Kai Stinchcombe. George Guerrero serves as the Chief Compliance Officer and an Investment Adviser Representative. Kai Stinchcombe is an indirect owner and Investment Adviser Representative. Their education information, business background, and other business activities can be found in the Form ADV Part 2B Brochure Supplement below.

### **Performance Fees**

We do not charge a performance-based fee (fees based on a share of capital gains on, or capital appreciation of, the assets of a client) for our normal asset management accounts.

### **Disclosable Events**

True Link nor its advisers have any reportable events to disclose here.

## **ADV Part 2B Brochure Supplement – George Guerrero**

**George Guerrero**

**CRD# 2606342**

**True Link Financial Advisors LLC**

**1147 Dolores St.**

**San Francisco, CA 94110**

**866-984-8576**

**[www.truelinkfinancial.com](http://www.truelinkfinancial.com)**

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This brochure supplement provides information about George Guerrero that supplements True Link Financial Advisors LLC's brochure. You should have received a copy of that brochure. Please contact us at 866-984-8576 if you did not receive True Link Financial Advisors LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about George Guerrero is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 - Educational Background and Business Experience

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Full Legal Name: George Guerrero

Year of Birth: 1972

### Education

Bachelors of Science, Accounting

1994

Binghamton University, Binghamton, NY

Masters Business Administration

2002

New York University, New York, NY

### Business History

Sep 2015 - Present

Investment Adviser Representative at True Link Financial Advisors LLC

Jan 2015 – Aug 2015

Vice President, Funds Management Group at Wells Fargo

Jan 2013 – Dec 2014

Financial and Operations Strategist at GEG Consulting

Mar 2010 – Mar 2012

Vice President of Financial Protection and Wealth Management at AXA Equitable

Aug 2007 – Mar 2010

Vice President of Investor Relations at AXA Equitable

Sep 2005 – Aug 2007

Vice President of AXA Funds Management Group at AXA Equitable

## Item 3 - Disciplinary Information

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Neither True Link nor George Guerrero has any disciplinary history to disclose.

## Item 4 - Other Business Activities

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As noted in Item 10 “Other Financial Industry Activities and Affiliations” above, George Guerrero has no outside business activities and/or affiliations to disclose.

## Item 5 - Additional Compensation

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George Guerrero does not receive any other compensation.

## Item 6 - Supervision

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George Guerrero is the CCO and performs all supervisory duties for his firm. George Guerrero may be reached at 866-984-8576 for any compliance related questions. The CCO regularly monitors client agreements and transactions for compliance with applicable regulatory rules and law.

## Item 7 – Requirements for State-Registered Advisers

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George Guerrero has no reportable events to disclose here.

## **ADV Part 2B Brochure Supplement – Kai Heimer Stinchcombe**

**Kai Heimer Stinchcombe**

**CRD# 6573531**

**True Link Financial Advisors LLC**

**1147 Dolores St.**

**San Francisco, CA 94110**

**866-984-8576**

**[www.truelinkfinancial.com](http://www.truelinkfinancial.com)**

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This brochure supplement provides information about Kai Stinchcombe that supplements True Link Financial Advisors LLC's brochure. You should have received a copy of that brochure. Please contact us at 866-984-8576 if you did not receive True Link Financial Advisors LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Kai Stinchcombe is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## **Item 6 - Supervision**

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Kai Stinchcombe is supervised by George Guerrero. George Guerrero may be reached at 866-984-8576 for any compliance related questions. The CCO regularly monitors client agreements and transactions for compliance with applicable regulatory rules and law.

## **Item 7 – Requirements for State-Registered Advisers**

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Kai Stinchcombe has no reportable events to disclose here.