



True Wealth

Financial

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of True Wealth Financial Group LLC. If you have any questions about the contents of this brochure, please contact us at (850) 450-8977 or by email at: mpotter@truewealthfg.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 True Wealth Financial Group LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Registration as an investment adviser does not imply a certain level of skill or training. True Wealth Financial Group LLC's CRD number is: 298597.

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UPDATED: 01/28/2022

Item 2: Material Changes

The last annual update of this Brochure was filed on January 6, 2021. The following changes have been made to this version of the Disclosure Brochure:

- **Item 4 Advisory Business -**
 - Revised True Wealth Retiring Service.
 - Revised True Wealth Planning Service.
 - Revised True Wealth Investing Service.
 - Revised True Wealth Hourly Service.
- **Item 5 Fees and Compensation -**
 - Revised the fee schedule for True Wealth Retiring Service.
 - Revised the fee schedule for True Wealth Planning Service.
 - Revised the fee schedule for True Wealth Investing Service.
 - Revised the fee schedule for True Wealth Hourly Service.

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by the securities regulators. Either this complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of True Wealth Financial Group LLC.

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Item 4: Advisory Business

A. Description of the Advisory Firm

True Wealth Financial Group LLC (hereinafter "TWFG") is a Limited Liability Company organized in the State of Florida. The firm was formed in June 2018, and the principal owner is Michael Potter.

B. Types of Advisory Services

True Wealth Retiring Service

True Wealth Financial provides Retirement Planning & Transition Services that helps clients plan, prepare for, and transition into retirement. This service focuses on helping clients identify what they want in the retirement stage of their lives, plan for the financial impacts of leaving the workplace, and execute a smooth transition to retirement with peace and purpose.

Retirement Planning & Transition Services may include, but not limited to the evaluation, analysis, and planning for the following areas: Life Planning, Financial Goals Planning, Estate Planning, Risk Management / Insurance Planning, Retirement Planning, Tax Planning, Investment Planning, Retirement Income Planning, Medicare Planning and Social Security Planning.

Retirement Planning & Transition Services is also inclusive of investment management services, should the client deem it adequate and/or appropriate. The client could also choice to implement recommendations on their own should they desire.

True Wealth Planning Service

True Wealth Financial provides Holistic Financial Planning Services that help clients identify and achieve their life and financial goals, minimize risk and taxes, while also reducing the stress related to money, so that they can focus on enjoying a life they truly desire and enjoy

Utilizing a goals-based modular planning approach, this service aims to help clients navigate the uncertainty of their future financial path, while helping them achieve their goals, minimizing risk, and doing it in a tax-efficient manner.

Holistic Financial Planning Services may include, but not limited to the evaluation, analysis, and planning for the following areas: Life Planning, Financial Goals Planning, Estate Planning, Risk Management / Insurance Planning, Retirement Planning, Tax Planning, Investment Planning.

Holistic Financial Planning Services is also inclusive of investment management services, should the client deem it adequate and/or appropriate. The client could also choose to implement recommendations on their own should they desire.

True Wealth Investing Service

True Wealth Financial provides Investment Management Services that help clients invest their hard-earned money, to help get it working for them, so that they are better positioned to achieve their future financial goals.

Investment management is designed to help those invest their money for future needs. Future needs could include, but is not limited to retirement, college, or other wealth building desires.

Inclusive of the True Wealth Investment Management Service, TWFG offers ongoing portfolio management based on the individual goals, objectives, time horizon, and risk tolerance of each client. TWFG creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

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

TWFG seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of TWFG's economic, investment or other financial interests. To meet its fiduciary obligations, TWFG attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios. It is TWFG'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.

We offer the use of Third-Party Managers, Outside Managers, or Sub-Advisors (TAMPs) for portfolio management services. We assist clients in selecting an appropriate allocation model, completing the Outside Manager's investor profile questionnaire, interacting with the Outside Manager, and reviewing the Outside Manager. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the Client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

True Wealth Hourly Service

True Wealth Financial provides Hourly Financial Planning Services that help clients on a project basis address and improve targeted financial concerns.

Hourly planning is designed to help those that either do not wish to engage in a full planning method or need more time that allotted throughout traditional planning services.

Hourly Planning Service is provided through 60-minute sessions. Clients receive information and planning assistance on topics to include, but not limited to: money management, cash-flow planning, debt management, savings, insurance, real estate, retirement, college planning, life events, and more. The intent is to aid clients on an as-needed relationship, to help gain clarity and confidence, through accountability on an as-needed hourly basis.

Services Limited to Specific Types of Investments

TWFG generally limits its investment advice to mutual funds and exchange-traded funds. TWFG primarily recommends utilizing a passive investment strategy, using mutual funds/ETFs for diversification, centralized on long-term value that outpaces inflation. TWFG may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

TWFG offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

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. TWFG does not participate in wrap fee programs.

E. Assets Under Management

TWFG has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$2,170,000	\$0	December 31, 2021

Item 5: Fees and Compensation

A. Fee Schedule

True Wealth Retiring Service Fees

Fixed Fees

TWFG charges an annual fixed fee of \$3,600, which is negotiable, for True Wealth Retiring Services.

Fees will be billed either monthly or quarterly in advance. Quarterly fees can be paid by EFT (electronic funds transfer) or billed from managed accounts. Monthly fees can be paid only by EFT.

Clients may terminate the agreement without penalty, for full refund of TWFG's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice. Upon receiving a written termination request, TWFG will refund the entire last fee paid by the client, either quarterly or monthly.

True Wealth Planning Service Fees

Fixed Fees

TWFG charges an annual fixed fee, for True Wealth Planning Services. The minimum fee is \$1,800.

The annual flat fee for the True Wealth Planning Service is based off a calculation consisting of 1% household income (as determined by their 1040 line 1) and .5% their net worth statement (as calculated on March 31st of each year)

Net worth will consist of all financial assets and tangible property (real estate, vehicles, collectibles, etc.) assessed with a value over \$1,000. Personal household items (furniture, clothing, etc.) will be excluded. The table below illustrates a couple of examples of fee calculations:

Annual Income	Net Worth	Annual Fixed Fee
\$0	\$750,000	$(1\% * 0) + (0.5\% * 750,000) = \$3,750$
\$250,000	\$10,000	$(1\% * 250,000) + (0.5\% * 10,000) = \$2,550$
\$100,000	\$50,000	$(1\% * 100,000) + (0.5\% * 50,000) = \$1,800$ (Min Fee)

Fees will be billed either monthly or quarterly in advance. Quarterly fees can be paid by EFT (electronic funds transfer) or billed from managed accounts. Monthly fees can be paid only by EFT.

Clients may terminate the agreement without penalty, for full refund of TWFG's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice. Upon receiving a written termination request, TWFG will refund the entire last fee paid by the client, either quarterly or monthly.

True Wealth Investing Service Fees

TWFG charged a 1% annual fee, for assets under management with the True Wealth Investing Services. TWFG uses the value of the account as of the first business day of the billing period, after considering deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

Additionally, TWFG charges a one-time upfront processing fee of \$29 which is negotiable, to open and/or set up the account as well as transfer existing assets.

Clients may terminate the agreement without penalty for a full refund of TWFG's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

When an Outside Manager is used, the Outside Manager will debit the Client's account for both the Outside Manager's fee, and TWFG's advisory fee, and will remit TWFG's fee to TWFG. Please note, the above fee schedule does not include the Outside Manager's fee.

No increase in the annual fee shall be effective without agreement from the Client by signing a new agreement or amendment to their current advisory agreement.

True Wealth Hourly Service Fees

Fixed Fees

Hourly Financial Planning engagements are offered at an hourly rate between \$150.00 and \$250.00 per hour, depending on complexity. The fee may be negotiable in certain cases and is due at the completion of the engagement. In the event of early termination by the Client, any fees for the hours already worked will be due.

B. Payment of Fees

Payment of True Wealth Retiring Service Fees

True Wealth Retiring Service fees are paid via electronic funds transfer from bank accounts or withdrawn directly from the client's managed investment accounts. Fees can be deducted monthly from bank accounts or quarterly from managed investment accounts or bank accounts via Electronic Funds Transfer (EFT).

Fixed True Wealth Retiring Service fees are paid 100% in advance, but never more than six months in advance.

Payment of True Wealth Planning Service Fees

True Wealth Planning Service fees are paid via electronic funds transfer from bank accounts or withdrawn directly from the client's managed investment accounts. Fees can be deducted

monthly from bank accounts or quarterly from managed investment accounts or bank accounts via Electronic Funds Transfer (EFT).

Fixed True Wealth Planning Service fees are paid 100% in advance, but never more than six months in advance.

Payment of True Wealth Investing Service Fees

True Wealth Investing Service fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis.

Fixed True Wealth Investing Service fees are paid 100% in advance, but never more than six months in advance.

Payment of True Wealth Hourly Service.

Financial Planning Hourly fees are paid from bank accounts via Electronic Funds Transfer (EFT).

Fixed hourly planning fees are paid 100% in advance, but never more than six months in advance.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by TWFG. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

TWFG collects fees in advance, as indicated above. Refunds for fees paid in advance but not yet earned will be refunded 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 for investing management, financial coaching, and hourly financial planning services. For fixed fees that are collected in advance for financial and retirement planning services, the entire last fee collected will be refunded. For fixed fees that are

collected in advance for hourly financial planning, will be refunded based on a pro-rata basis for hours not complete.

E. Outside Compensation For the Sale of Securities to Clients

Neither TWFG nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

TWFG 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.

Item 7: Types of Clients

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

- ❖ Individuals
- ❖ High net-worth Individuals
- ❖ Pension and Profit Sharing Plans

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

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

TWFG's methods of analysis include Modern portfolio theory.

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.

Investment Strategies

TWFG uses Passive Investment Management Strategies.

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

TWFG primarily practices passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark.

Use of Outside Managers

We may refer Clients to third-party investment advisers ("outside managers"). Our analysis of outside managers involves the examination of the experience, expertise, investment philosophies, and past performance of the outside managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the manager's compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that he or she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in an outside manager's portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our Clients. Moreover, as we do not control the manager's daily business and compliance operations, we may

be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

B. Material Risks Involved

Methods of Analysis

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.

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 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 costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

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.

Item 10: Other Financial Industry Activities and Affiliations

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

Neither TWFG nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

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

Neither TWFG 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

Michael Potter is a Cyber Analyst for Raytheon Space and Intelligence supporting the department of homeland security with cyber incident response services. He does/will not offer services from this outside activity to clients of True Wealth Financial Group LLC.

As referenced in Item 4 of this brochure, TWFG recommends Clients to Outside Managers to manage their accounts. In the event that we recommend an Outside Manager, please note that we do not share in their advisory fee. Our fee is separate and in addition to their compensation (as noted in Item 5) and will be described to you prior to engagement. You are not obligated, contractually or otherwise, to use the services of any Outside Manager we recommend. Additionally, TWFG will only recommend an Outside Manager who is properly licensed or registered as an investment adviser.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

TWFG does not utilize nor select third-party investment advisers.

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

A. Code of Ethics

TWFG 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. TWFG's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

TWFG does not recommend that clients buy or sell any security in which a related person to TWFG or TWFG has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

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

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

From time to time, representatives of TWFG may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of TWFG 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, TWFG will never engage in trading that operates to the client's disadvantage if representatives of TWFG buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

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

Custodians/broker-dealers will be recommended based on TWFG'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 TWFG 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 TWFG's research efforts. TWFG will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

TWFG will recommend clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC Charles Schwab & Co. and Capital Group. The broker-dealer/custodian is not affiliated with TWFG and does not supervise TWFG, its representatives, or its activities.

1. *Research and Other Soft-Dollar Benefits*

While TWFG has no formal soft dollars program in which soft dollars are used to pay for third party services, TWFG may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions (“soft dollar benefits”). TWFG may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client’s transactions paid for it, and TWFG does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. TWFG benefits by not having to produce or pay for the research, products or services, and TWFG will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that TWFG’s acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. *Brokerage for Client Referrals*

TWFG 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*

TWFG will recommend clients to use a specific broker-dealer to execute transactions. TWFG will not permit client to direct it to execute transactions through a specified broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

TWFG does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

Item 13: Review of Accounts

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

All client accounts for TWFG's advisory services provided on an ongoing basis are reviewed at least Annually by Michael Potter, Owner, with regard to clients' respective investment policies and risk tolerance levels. All accounts at TWFG are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Michael Potter, Owner. 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, TWFG's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of TWFG's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report 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)

TWFG participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. TWFG receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, TWFG participates in TD Ameritrade's institutional advisor program and TWFG may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between TWFG's participation in the Program and the investment advice it gives to its clients, although TWFG receives economic benefits through its participation in the Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving TWFG participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have TWFG's fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to TWFG by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by TWFG's related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit TWFG but may not benefit its client accounts. These products or services may assist TWFG in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help TWFG manage and further develop its business enterprise. The benefits received by TWFG or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, TWFG endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by TWFG or its related persons in and of itself creates a conflict of interest and may indirectly influence the TWFG's choice of TD Ameritrade for custody and brokerage services.

Charles Schwab & Co., Inc. Advisor Services provides TWFG 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 TWFG 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 TWFG other products and services that benefit TWFG but may not benefit its clients' accounts. These benefits may include national, regional or TWFG 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 TWFG 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 TWFG 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 TWFG'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 TWFG's accounts. Charles Schwab & Co., Inc. Advisor Services also makes available to TWFG other services intended to help TWFG 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 TWFG 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 TWFG. TWFG is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

B. Compensation to Non - Advisory Personnel for Client Referrals

TWFG does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, TWFG will be deemed to have limited 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, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

TWFG does not have discretion over client accounts at any time.

Item 17: Voting Client Securities (Proxy Voting)

TWFG 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.

Item 18: Financial Information

A. Balance Sheet

TWFG neither requires nor solicits prepayment of more than \$500 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 TWFG nor its management has any financial condition that is likely to reasonably impair TWFG's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

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

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

TWFG currently has only one management person: Michael Lawrence Potter. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

TWFG 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.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.