

Form CRS - Client Relationship Summary June 6, 2024

INTRODUCTION

Taurum Retirement Partners, LLC (referred to herein as “we,” “us,” or “our”) is registered with the U.S. Securities and Exchange Commission as an investment advisor. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available for you to use to research firms and financial professionals at www.investor.gov/crs, which also provides educational materials about broker-dealers, investment advisors, and investing.

RELATIONSHIPS AND SERVICES

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

We offer investment advisory services to individuals and high net worth individuals. Our services include portfolio management services and third-party asset management platforms. Our firm’s portfolio management services incorporate personalized asset allocations to construct portfolios that meet your long-term financial goals. We do not require a minimum investment amount for portfolio management services.

During the initial meeting, we typically request information regarding your financial circumstances (e.g., income, net worth, risk tolerance, investment goals and objectives, investment experience, time horizon, tax status, other financial data, etc.). We use this information to implement personalized asset allocation strategies to construct the portfolios for your advisory account(s). We also incorporate limited financial planning methodologies to complement our portfolio management services; however, we do not prepare financial plans. In our view, utilizing limited financial planning techniques assists you in understanding your comprehensive financial goals and objectives.

Our firm only implements portfolio management services under discretionary trading authority. You authorize us to use discretionary trading authority when you sign our advisory agreement. Discretionary trading authority permits our firm to make initial and ongoing decisions regarding the types of investment to buy and sell to implement the asset allocation strategies for your advisory account(s). We typically invest in actively managed mutual funds, exchange-traded funds, equities, and bonds. Our advisory recommendations and strategies are implemented without your prior approval; however, we rely on the analysis of your financial circumstances. Although we have discretionary trading authority, you may impose reasonable restrictions. Typical restrictions include limitations on the types of investments in certain industries or on specific dollar amounts or the number of shares that are invested in any one type of investment or asset class, etc.

We also offer third-party asset management platforms as an additional provision under our portfolio management services. These services consist of separately managed portfolios managed by third-party platforms or sub-advisors. The third-party investment management platform that we currently recommend is used as a solution for typical taxes, expenses, and charges related to insurance products that may have been sold to you in the past. If a large portion of your assets are invested in insurance products, we will likely recommend that you utilize third-party asset management platforms. Although we do not impose a minimum investment amount, third-party asset management platforms typically have minimum investment requirements that vary according to the program.

After you engage our firm for portfolio management services, the advisory agreement remains in effect until the advisory relationship is terminated by either you or us. For additional information, please review the following sections of our Brochure: [Item 4 Advisory Services](#), [Item 7 Types of Clients](#), [Item 10 Other Industry Activities and Affiliations](#), and [Item 16 Investment Discretion](#).

Ask your financial professional these questions about our relationships and services:

- **Given my situation, should I choose an investment advisory service? Why or Why not?**
- **How will you choose investments to recommend to me?**
- **What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?**

FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

WHAT FEES WILL I PAY?

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

Our fee schedule for portfolio management services is published in [Item 5 Fees and Compensation](#) of our Brochure. We charge an annual ongoing asset-based fee. Advisory fee calculations are based on a percentage of the value of the investment assets in the advisory accounts that we manage for you. We bill you quarterly in advance for portfolio management services. Quarterly in advance means at the beginning of each quarterly period (i.e., Jan. 1., Apr. 1, Jul. 1, Oct. 1). The advisory fee calculation is based on the value of the investment assets in your advisory account(s) on the last trading day of the previous quarter (i.e., Dec. 31., Mar. 30, Jun. 30, Sept. 30). We aggregate the value of all accounts within a household to calculate advisory fees. Upon signing our advisory agreement, you authorize us to deduct advisory fees from the investment assets in your advisory account(s).

Advisory fees for third-party asset management services range up to 2.00% per annum. Advisory fees for these services are based on the value of the assets managed by the third-party asset management platform. The third-party asset management platform pays our firm its portion of the aggregate advisory fee deduction. Our firm does not charge additional fees for third-party asset management services.

In addition to the advisory fees you pay our firm, there are additional costs and fees associated with investing. You are responsible for paying all other costs and expenses, including but not limited to transaction costs for buying and selling securities, account maintenance fees, electronic fund transfer and wire fees, mailing fees, insufficient funds fees, regulatory fees for securities sold, etc. The account custodian that holds your advisory account(s) will charge these fees. The fees and expenses listed here are not exhaustive. Please inquire about the fees, costs, and expenses associated with your advisory account(s). We will provide a detailed listing of fees and expenses upon your request. **For additional information, please be sure to review [Item 5 Fees and Compensation](#) of our Brochure.**

Ask your financial professional this question about the impact of fees and costs on investments:

- **Help me understand how these fees and costs might affect my investments. If I give you \$10,000, how much will go to fees and costs, and how much will be invested for me?**

WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISOR? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS DO YOU HAVE?

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

Our fiduciary duty requires us to act with a substantial duty of care and operate according to a commitment of loyalty. As a result of the tremendous amount of confidence and trust you place in us, we are required to conduct our advisory business in accordance with these obligations.

In adhering to our duty of care mandate, we must obtain details regarding your financial circumstances. We must also ensure that our recommendations align with the evaluation of your financial circumstances. We are also required to conduct due diligence on the investments we recommend to you and continually monitor our recommendations during the advisory relationship.

Our duty of loyalty to you requires our firm and financial professionals to provide advice that is free from self-interest and to always place your interests before our own. We must make full and fair disclosure of all material facts related to our advisory business and services. We are also required to avoid or disclose circumstances where our interests actually conflict, could potentially conflict, or have an appearance of conflict with your interests.

The way we make money conflicts with your interests. The third-party asset management services we offer are typically provided pursuant to referral or sub-advisory arrangements (i.e., referring you to a platform). Therefore, we earn money when we refer you to a third-party investment management platform. These arrangements present potential conflicts if we refer based on our compensation rather than your best financial interest. We are incentivized by the prospect of earning additional fee revenue as a result of these referral arrangements. This incentive creates a conflict with your interests.

We also earn additional advisory fee revenue as a result of managing more investment assets on your behalf. The prospect of additional fee revenue incentivizes us to encourage you to invest more assets with our firm. The incentive to increase our assets under management creates an inherent conflict with your interests.

Please also review [Item 4 Advisory Services](#), [Item 10 Other Industry Activities and Affiliations](#), and [Item 11 Code of Ethics](#) of our Brochure for details regarding other actual or potential conflicts of interest.

Ask your financial professional this question about our conflicts of interest:

- **How might your conflicts of interest affect me, and how will you address them?**

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our financial professionals are paid salaries from our firm. We do not provide direct or indirect compensation based on sales incentives, minimum asset quotas, or any transaction-based sales.

However, one of our financial professionals is a licensed insurance agent and receives compensation from the sale of insurance products. When you choose to work with one of our financial professionals for insurance services, they will earn insurance commissions directly from an insurance agency. The commissions earned will be in addition to the advisory fees paid to our firm.

DISCIPLINARY HISTORY

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE A LEGAL OR DISCIPLINARY HISTORY?

NO. Neither our firm nor financial professionals have a legal or disciplinary history. Please also visit www.investor.gov/crs for a free and simple search tool to research our firm and financial professionals.

Ask your financial professional these questions about legal or disciplinary history information:

- **As a financial professional, do you have any disciplinary history? For what type of conduct?**

ADDITIONAL INFORMATION

For additional information about our investment advisory services, please review the attached copy of our Brochure or as available in electronic format on our website at www.taurumfinancial.com. If you would like additional, up-to-date information, or a copy of this relationship summary, please contact our Chief Compliance Officer, Robert V. Sollis, ChFC®, by email at rob@taurumfinancial.com.

Ask your financial professional these questions about our firm and supervisory contacts:

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

BROCHURE
(Form ADV Part 2A)

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June 6, 2024

This brochure ("Brochure") provides you with information about the qualifications and business practices of *Taurum Retirement Partners, LLC*. It contains information that you should consider before becoming a client of our firm.

The information contained herein has not been approved or verified by any governmental authority. Our firm is an investment advisory firm registered pursuant to the laws of the United States Securities and Exchange Commission. Registration of an Investment Adviser does not imply a certain level of skill or training, we have only filed registration documents in the appropriate jurisdictions with the respective governmental entities.

If you have any questions about the contents of this Brochure, please contact us by telephone at (480) 626-2501. Additional information about Taurum Retirement Partners, LLC (CRD No. [282017](#)) can be found on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by a search using the firm's CRD number.

MATERIAL CHANGES (Item 2)

Taurum Retirement Partners Material Changes

This version of our Brochure, dated June 6, 2024, is an interim amendment that reflects our firm's investment advisor registration pursuant to the laws and regulations of the U.S. Securities and Exchange Commission (SEC).

The following are the material changes highlighted in our annual amendment filing of March 29, 2024:

Advisory Services (Item 4)

Assets Under Management

We have updated our assets under management as required by regulations. We manage a total of approximately \$116,270,715* in client assets, of which \$114,408,715 is managed on a discretionary basis, and \$1,862,000 is managed on a non-discretionary basis. *Our asset values are based on calculations as of December 31, 2023.

General Revisions

We have revised some language and content to ensure our disclosures are concise and unambiguous.

Full Brochure Available

The foregoing summarizes the interim amendments in our Brochure dated June 6, 2024. If you have questions about the most recent updates or would like a full copy of our Brochure, please contact us by telephone at (480) 626-2501 or by email at rob@taurumfinancial.com.

Please also note that additional information about Taurum Retirement Partners, LLC (CRD No. 282017) can be found on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by a search using our CRD number.

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ADVISORY SERVICES (Item 4)

About Our Business

Taurum Retirement Partners, LLC (also referred to herein as “we,” “us,” or “our”) is an investment management firm that provides advice and recommendations regarding portfolio management construction and strategies. We are an Arizona limited liability company, and our principal place of business is located in Mesa, Arizona. Our firm also conducts business in the state of Utah. We began providing financial advice and managing our clients’ investments in October of 2016.

Mr. Robert V. Sollis, ChFC®, is our firm’s managing member and chief compliance officer. He is also an investment advisor representative.

Types of Advisory Services

We are a boutique investment management firm that provides customized portfolio management strategies based on a client’s specific goals, objectives, and needs. A detailed explanation of our services is as follows:

1. Portfolio Management Services

We offer discretionary portfolio management services that incorporate personalized asset allocations to construct portfolios that meet our client’s long-term investment goals and objectives. Our firm provides investment advice regarding securities, including but not limited to common stock, preferred stock, mutual funds, bonds, exchange-traded funds (ETFs), non-traditional ETFs (e.g., leveraged, inverse, or inverse-leveraged, etc.), certificate of deposits, U.S. government securities, corporate bonds, municipal securities, closed-end funds, unit investment trusts (UITs), real estate investment trusts (REITs), options, exchange-traded notes, and alternatives. When implementing an investment strategy, we typically recommend constructing a client’s portfolio holdings using actively managed mutual funds, exchange-traded funds, equities, and bonds.

While we do not prepare financial plans, we will incorporate limited aspects of financial planning to complement our portfolio management services. Incorporating limited financial planning methodologies assists our clients in understanding their overall financial goals. This step also ensures that our investment advice is effectively tailored to a client’s specific needs. Even so, our portfolio management services are not implemented as a result of a client’s holistic financial goals but instead are based on each client’s particular portfolio management needs. There are no separate or additional fee assessments for incorporating financial planning techniques.

2. Third-party Asset Management Services

We select and recommend advisory platforms of other investment advisors with managed strategies to meet our client’s needs and objectives. These third-party institutional money managers or sub-advisors (“sub-advisors”) offer managed investment programs or model portfolios with various investment strategies.

We monitor the sub-advisor’s strategies to ensure its objectives align with our client’s investment objectives and risk tolerance. Although the sub-advisors are granted discretionary authority to manage client assets, we are responsible for the ongoing rebalancing and continuous monitoring of our client’s securities holdings.

We currently offer third-party asset management services through the following platform(s):

Nationwide Advisory Solutions

Nationwide Advisory Solutions is a variable annuity platform that offers flat-rate variable annuity investment solutions for retirement income, annuity rescue, jumbo tax deferral, and principal protection. Details regarding the managed program are fully described in the Nationwide Advisory Solutions Brochure, which is provided upon recommendation.

Tailored Services

Our advice and services are based on the individual needs of a client after analyzing and thoroughly evaluating the client's goals, objectives, investment horizon, and risk tolerance. Clients may impose restrictions on investing in certain asset classes or specific types of securities by advising their investment advisor representative of such limitations.

Wrap Fee Programs

We are not a sponsor of or participant in any wrap fee program.

Assets Under Management

We manage a total of approximately \$116,270,715* in client assets, of which \$114,408,715 is managed on a discretionary basis, and \$1,862,000 is managed on a non-discretionary basis. *Our asset values are based on calculations as of December 31, 2023.

FEES AND COMPENSATION (Item 5)

Advisory Fees

We earn fees and compensation by providing advice regarding investments and recommending investment strategies. Our fees for services are as follows:

1. Portfolio Management Services

Assets Under Management	Quarterly Rate	Annual Rate
First \$500,000	0.2875%	1.15%
Next \$500,000	0.25%	1.00%
Next \$1,000,000	0.2125%	.85%
Next \$2,000,000	0.175%	.70%
Next Amount Over \$3,000,00	0.1375%	.55%

Sample Fee Calculation

Investments of \$1,500,000

First \$500,000 @ 1.15% = \$5,750

Next \$500,000 @ 1.00% = \$5,000

Next \$500,000 @ .85% = \$4,250

Effective Annual Blended Rate of 1.00%

Quarterly Fee of \$3,750 | Annual Fee of \$15,000

Our fee schedule for portfolio management services is negotiable. Advisory fees are negotiable based on pre-existing relationships, related accounts, the anticipation of additional assets within the next twelve (12) months, or any other criteria we deem pertinent. The final advisory fee is outlined in our investment advisory contract.

2. Third-party Asset Management Services

The aggregate fee for third-party asset management services ranges up to 2.00% per annum, depending on the program. The fees are based on the account value and rate determined by the specific third-party asset manager. Generally, the per annum amount includes the fees assessed by our firm. The final fee and other charges are outlined in the third-party asset manager's brochure, management agreement, and other disclosure documents. Our arrangements with third-party asset managers are typically sub-advisory or referral-based (i.e., pursuant to an endorsement arrangement). If we agree to receive referral fees from third-party asset managers, clients must acknowledge receipt of disclosures regarding such referral compensation.

Billing Procedures

Please review the following for our specific billing procedures:

1. Portfolio Management Services

Our advisory fees for portfolio management services are due and payable quarterly in advance (at the beginning of the billing period). Advisory fee calculations are based on the value of the account(s) as of the last day of the previous calendar quarter (i.e., Dec., Mar., Jun., and Sept.) and calculated using 25% of the applicable annual rate (i.e., quarterly rate). Our firm aggregates the value of accounts within a household to calculate advisory fees. Upon signing our investment advisory contract, clients provide written authorization for our firm to deduct advisory fees directly from their specified advisory account(s).

We send the advisory fee calculations to the account custodian electronically at or around the beginning of each calendar quarter (i.e., Jan., Apr., July, and Oct.). Advisory fees due for any period of less than one calendar quarter shall be calculated pro rata, commencing on the date of a client's engagement of our firm. Additionally, billing valuations for fixed-income securities often include accrued interest. Furthermore, margin interest, if applicable, will accrue monthly. It is also important to note that due to differences in valuation dates (trade date vs. settlement date), application of credits for accrued income, and/or accrued interest, if applicable, asset values used for advisory fee billing can differ from the asset values shown on the account custodian's statement. Clients should contact our firm if there are questions regarding advisory fee billing calculations.

Some clients have legacy alternative investment holdings. Please note that there are some limitations with respect to the valuation of alternative investments. Due to the illiquidity of certain alternative investments, pricing anomalies exist. The value of most alternative investments reflects either the initial purchase or the most recent valuation provided by either the account custodian, a pricing service, or the issuer. If the value reflects the initial purchase price (or value as of a previous date), the current value (to the extent ascertainable) could be significantly more or less than the initial purchase price or aggregate amount invested. For billing purposes, we use the last value of the aggregate amount invested, as reported by the account custodian. This value is included as a part of the total value of a client's portfolio holdings for advisory fee calculations.

2. Third-party Asset Management Services

Generally, the aggregate fee for third-party asset management services is deducted directly from the client's accounts pursuant to written authorization incorporated into the sub-advisor's management agreement. Advisory fees for these services are typically assessed quarterly in advance by the sub-advisor. Correspondingly, the sub-advisor will pay our firm its portion of the aggregate fee deduction. Our firm charges no additional fees. Generally, the advisory fees are calculated based on the value of all the assets in the account(s). However, each sub-advisor on the platform may calculate its fee based on the value of those assets in the client's account(s) for which the sub-advisor provided services.

Other Fees & Expenses

Clients will also incur additional third-party fees and expenses ("third-party fees") related to managing investments and advisory service provisions. These fees may include but are not limited to no-load mutual fund ticket charges, brokerage transaction costs, deferred sales charges on previously purchased mutual funds, individual retirement account (IRA) maintenance fees, and other legal or transfer fees. The account custodians, broker-dealers, mutual fund companies, and others who provide account services charge these fees, and clients are responsible for payment of all third-party fees and expenses. Although, as of the date of this Brochure, our account custodian does not charge transaction costs for trades in equity securities (i.e., stocks, exchange-traded funds, etc.).

Additionally, there are more expenses when client assets are invested in mutual funds, exchange-traded funds, money market mutual funds, closed-end funds, and other investment company securities. These are direct

internal expenses of the investment company that issues the security but a cost borne by investors (clients). The specific fees and expenses are outlined in each investment company security prospectus.

Advisory fees paid to our firm are separate from the third-party fees detailed above. Please also refer to Item 12, Brokerage Practices, for information regarding the qualified account custodian that provides custody and safekeeping services for our clients' accounts.

Refund Policy

Either party may terminate our investment advisory contract by providing the other party thirty (30) days' advance written notice. Upon receiving a client's termination request, we will assess fees pro-rata, if applicable, to the date of termination. We will refund any unearned portion of prepaid fees within fourteen (14) days. Any balances for unpaid fees due to our firm will be collected prior to the disbursement of funds, if applicable. If we are unable to deduct final fees from the client's advisory account(s), such as in the case of an account transfer, we will transmit a final advisory fee invoice to the client, which is due upon receipt. Clients pay final advisory fee invoices by mailing a check to our address.

Notwithstanding the refund policy above, advisory engagements for third-party asset management services generally require at least sixty (60) days' advance written notice to terminate services. Upon receiving a client's termination request, we will inform the third-party asset management platform and ensure that fees are assessed pro-rata, if applicable, and refunds issued as outlined in the service agreement.

Other Compensation

Neither our firm nor investment advisor representatives accept compensation for the sale of securities or other investment products, such as asset-based sales charges or fees from the sale of mutual funds. Our investment advisor representatives are not registered in any investment sales capacity.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT (Item 6)

We do not charge performance-based fees or conduct side-by-side investment product management.

TYPES OF CLIENTS (Item 7)

We generally provide investment advice to individuals and high net worth individuals. Our firm does not require a minimum investment amount for portfolio management services.

Nonetheless, third-party investment management platforms typically have minimum investment requirements that vary according to the program.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS (Item 8)

Methods of Analysis and Investment Strategies

We generally utilize Modern Portfolio Theory and other fundamental analysis methodologies to evaluate investments. Our primary sources of information include, but are not limited to, research materials prepared by others, inspection of corporate activities, financial publications, annual reports, prospectuses, and corporate press releases.

Fundamental analysis is used to assess a company's overall performance and profitability by reviewing financial condition, industry position, monetary policy, and other market and economic indicators to select the investments it offers.

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 that has better than expected returns.

Our portfolio management strategies include portfolio construction advice, suitable asset allocation, diversification, and risk management. Our general recommendations include actively managed mutual funds, exchange-traded funds, equities, and bonds.

Additionally, if we recommend alternative investments to augment a client's investment portfolio, we generally limit such investments to thirty percent (30%) or less of a client's portfolio holdings.

Material Risks of Methods of Analysis and Investment Strategies

INVESTING IN SECURITIES INVOLVES A RISK OF LOSS THAT CLIENTS SHOULD BE PREPARED TO BEAR.

Furthermore, although we utilize conventional investment analysis methods and strategies, some degree of material risk still exists. When our firm uses fundamental analysis methods to measure the risks of companies, we formulate assumptions based on historical financial representations. Although we use valid data sources, examine expense ratios, review returns and risk ratings extensively, refer to economic indicators, review the implications of monetary policy, and consider management team tenure, our strategies are implemented based on assumptions derived from the analysis of historical data. Since the past performance of an investment is not indicative of future financial returns, we cannot guarantee results derived by implementing strategies using this method of analysis.

Clients should be aware that all securities and investment strategies have various types of risks. While it is impossible to name all potential risks associated with our specific methods of analysis and investment strategies, some risks are as follows:

- **General Market Risk.** As a whole, markets can go up or down on various news releases or for no explicable reason. This uncertainty means that, at times, the price of specific securities could go up or down without real reason and may take some time to recover any lost value. Adding additional securities may not help minimize this risk since market fluctuations affect all securities. Market fluctuations will ultimately affect a client's portfolio holdings.
- **Interest Rate Risk.** Changes in interest rates will affect the value of a portfolio's holdings invested in fixed income securities. The value of fixed income securities is more inclined to decrease as interest rates increase. This decrease in value may not be offset by income from new investments or other portfolio holdings. Interest rate risk is generally greater for fixed income securities with longer maturities or durations.
- **Financial Risk.** All companies have exposure to financial risks. Excessive borrowing to finance business operations decreases profitability because the company must meet the terms of its financial obligations in good and bad economic times. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or declining market value of a company's securities. All businesses are susceptible to financial risks at some point in a business cycle. When we invest in companies with excessive debt, the financial risk of that company could negatively affect a client's portfolio holdings.
- **Time Horizon Risk.** A client may require the liquidation of portfolio holdings earlier than the anticipated time horizon. If liquidations occur during a period when portfolio values are low, the client will not realize as much value as he or she would have if the portfolio holdings had the opportunity to gain value (or regain value) as investments frequently do.
- **Liquidity Risk.** Liquidity is the ability to convert an investment into cash readily. Some investment vehicles are highly liquid, while others are illiquid. For example, Treasury Bills are highly liquid, while real estate is not. Illiquid investments carry more risk than other securities because it can be difficult to sell or liquidate such investments at a fair market price.

- **Asset Allocation Risk.** The asset classes represented in a client's portfolio holdings can perform differently at any given time, as well as over the long term. A client's portfolio holdings will be affected by the allocation among equity securities, fixed income securities, and cash equivalents. If any asset class that comprises a client's holdings underperforms, the performance of other asset classes may suffer.
- **Equity Securities Risk.** Equity securities such as common stocks and preferred stocks are subject to changes in value attributable to the market perception of a particular issuer or general stock market fluctuations affecting all issuers. Investments in equity securities may be more volatile than other types of investments. Additionally, the value of a company's preferred stock is typically subject to an inverse relationship with interest rates.
- **Investment Company Securities Risk.** Investments in investment company securities such as mutual funds, exchange-traded funds ("ETFs"), unit investment trusts ("UITs"), and/or closed-end mutual funds have risks. This risk disclosure focuses on mutual funds, including closed-end mutual funds. See specific details regarding the risks associated with ETFs and UITs below. The risks associated with investing in mutual funds and closed-end mutual funds involve substantially the same risks as investing directly in the underlying securities (i.e., general market risks, interest rate risks, financial risks, time horizon risks, liquidity risks, etc.). There are also risks that mutual funds and closed-end mutual funds may not achieve their investment objective or execute their investment strategy effectively, which may adversely affect the performance of a client's portfolio.

Additionally, clients pay a pro-rata portion of the fees, expenses, and taxes associated with investment company securities, which will likely impact the value of a client's portfolio holdings.

- **Exchange-Traded Funds Risk.** There are risks associated with investing in exchange-traded funds (ETFs) that may be unrecognized. ETFs are offered for all asset classes, industries, sectors, markets, etc. The risks associated with passively managed and actively managed ETFs are as follows:

Passively Managed ETFs represent an interest in a portfolio of securities designed to track an underlying benchmark or index. These ETFs typically seek to track an underlying benchmark or index; the ETF may or may not hold all securities in the underlying benchmark or index. ETFs are also subject to price variations. ETFs trade daily, and market prices are generally at or near the most recent net asset value (NAV). However, certain market inefficiencies may cause the ETF shares to trade at a premium or discount to the stated NAV. For example, a high volume of market sales may cause ETFs to trade below the value of the underlying NAV.

Actively Managed ETFs are designed to outperform an index. These portfolios generally expose a high percentage of the net assets to a fixed list of investments (e.g., U.S. exchange-listed equity securities, U.S. exchange-traded funds that provide exposure to U.S. exchange-listed equity securities, U.S. exchange-listed equity securities of non-U.S. issuers, including the securities of non-U.S. issuers traded on U.S. exchanges in the form of depository receipts, etc.). The actively managed ETFs may also have exposure to futures, other derivatives, and long and short positions, all of which may not perform as expected. These ETFs are subject to the risk that they may not effectively outperform the index, industry, or other markets that they intend to outperform. In addition to the foregoing risks, there are also risks that the expenses of actively traded ETFs will reduce returns, that the portfolio manager's strategies are not successful, that there is low trading volume, or that the investment does not perform as expected, thereby resulting in losses.

Moreover, as with any security, there is no guarantee that an active secondary market for such ETF shares will continue to exist. Also, the redemption of ETFs can be limited. Only an authorized participant (generally broker-dealers that act as liquidity providers) may engage in the creation or redemption transactions of an ETF. Furthermore, ETFs typically have a limited number of broker-dealers that may act as authorized participants. To the extent that authorized participants exit the business or are unable to proceed with creation or redemption orders, and no other authorized participant can step forward, the liquidity of an ETF is likely to be impacted and could face trading halts or delisting.

- **Non-traditional Exchange-Traded Funds Risk.** Non-traditional exchange-traded funds (ETFs) include leveraged, inverse, or inverse-leveraged ETFs. Levered ETFs seek to deliver multiples of the performance of an underlying index or benchmark for a specified period (usually a single day). Inverse ETFs are generally “short positions” seeking to deliver the opposite of an underlying index or benchmark for a specified period of time. Inverse-leveraged ETFs seek to deliver multiples of the opposite of an underlying index or benchmark for a specified period. Due to the effect of compounding, their performance over more extended periods of time can differ significantly from the performance, which can be magnified in volatile markets. Inverse ETFs reset daily and are designed to achieve their stated objectives daily.

Non-traditional ETFs are not long-term investments. They are extremely speculative and can be quite volatile. Investments in non-traditional ETFs should be monitored daily to ensure that the risks associated with such investments remain appropriate for a client’s portfolio holdings, especially during volatile markets when risks intensify.

- **Unit Investment Trusts Risk.** Unit Investment Trusts (UITs) are registered investment companies with characteristics of both mutual funds and closed-end funds. UITs fall into two (2) main categories: bond trusts and equity trusts. The trust associated with the UIT is typically concentrated in a specific sector. As a result, any factor that impacts the sector will likely have a greater effect on the trust.

Furthermore, sector predictions may not materialize, and the companies selected for the trust may not represent the entire sector and may not participate in the overall sector growth. Share prices or dividend rates on the securities in the trust may decline during the life of the trust. There is no guarantee that share prices of the securities in the trust will not decline and that the issuers of the securities will declare dividends in the future and, if declared, whether they will remain at current levels or increase over time. Inflation may lead to a decrease in the value of assets or income from investments. UITs are not actively managed and should be considered part of a long-term strategy.

- **Exchange-Traded Notes Risk.** Exchange-traded notes (ETNs) are subject to credit, liquidity, and supply risks. ETNs are senior, unsecured, unsubordinated debt securities whose returns are linked to the performance of a particular benchmark or strategy minus applicable fees. ETNs are traded during regular trading hours; however, clients can also hold the ETN until maturity. At maturity, the issuer pays clients a cash amount equal to the principal amount, subject to the day’s benchmark or strategy factor.

ETNs do not make periodic coupon payments or provide principal protection. ETNs are subject to credit risk, and the value of the ETN may drop due to a downgrade in the issuer’s credit rating despite the underlying benchmark or strategy remaining unchanged. The value of an ETN may also be influenced by time to maturity, level of supply and demand, volatility, and lack of liquidity in underlying assets, changes in the applicable interest rates, changes in the issuer’s credit rating, and economic, legal, political, or geographic events that affect the referenced underlying asset. When clients invest in ETNs, their portfolio will bear its proportionate share of any fees and expenses borne by the ETN. The availability of a secondary market may limit our decision to sell an ETN portfolio holding. ETNs are also subject to tax risk. The government and tax agencies may implement changes to the tax code that change the timing and character of income and gains from ETNs. There may also be times when ETN shares trade at a premium or discount to the benchmark or strategy.

- **Credit Risk.** An issuer or guarantor of a fixed income security may be unable or unwilling to make timely payments of interest or principal or honor its obligations otherwise. The issuer or guarantor may default, causing a loss of the full principal amount of a security. The degree of risk for a particular security may be reflected in its credit rating. There is the possibility that the credit rating of a fixed income security may be downgraded after purchase, which may adversely affect its value and a client’s portfolio holdings.
- **Fixed Income Securities Risk.** Fixed income securities include bonds or other securities issued or guaranteed by the U.S. government (its agencies), or U.S. government-sponsored enterprises, states, territories, local governments (and their agencies), and corporate debt securities of issuers, including convertible securities and corporate commercial paper (e.g., U.S. Treasury securities, U.S. Agency

securities, municipal bonds, investment grade bonds, non-investment grade bonds, etc.). The market value of fixed-income securities is sensitive to changes in interest rates. Generally, when interest rates rise, the value of fixed income securities declines, and when interest rates decline, the market value increases. Usually, the longer the remaining maturity of a fixed income security, the greater the effect of interest rate changes on the market value. In addition, changes in the issuer's ability to make payments of interest and principal and the market's perception of an issuer's creditworthiness can affect the market value of its fixed-income securities.

Fixed income securities are also subject to inflation, liquidity, and reinvestment risks. Inflation risk is the risk that inflation will erode the purchasing power of the cash flows generated by debt securities. Fixed-rate debt securities are more susceptible to inflation risk than floating-rate debt securities. Liquidity risk is the risk that certain fixed income securities may be difficult to sell at a particular time or at an acceptable price, which may cause a client's portfolio to hold these securities for longer periods than planned or forgo other investment opportunities, which creates a reinvestment risk.

- **Municipal Securities Risk.** Municipal securities issuers may face local economic or business conditions (including bankruptcy) and litigation, legislation, or other political events that could significantly affect the ability of the municipality to make payments on the interest or principal of its municipal bonds. Municipalities issue municipal securities to finance projects, such as education, healthcare, transportation, infrastructure, and public services, and conditions in those sectors can affect the overall municipal bond market. Moreover, changes in the financial condition of one municipality may affect the overall municipal bond market. The municipal obligations in which clients invest are subject to credit risk, market risk, interest rate risk, credit spread risk, selection risk, call and redemption risk, and tax risk, and the occurrence of any one of these risks may materially and adversely affect the value of a client's portfolio holdings or assets.
- **Margin Risk.** Margin is a loan issued to clients that permits leverage of current portfolio holdings, increases buying power for additional positions/investments, facilitates advanced trading strategies (e.g., options, short sales, etc.), or uses it as a line of credit. When margin is used as leverage, clients seek to enhance returns through the use of leverage. Leverage can be described as exposure to changes in the price of an investment at a ratio greater than 1:1 relative to the amount invested.

Clients who elect to trade on margin will enter into a separate agreement directly with the account custodian's clearing firm. If a client requests margin and the strategy aligns with the investment goals that our firm has implemented, we will instruct the client to complete and submit the account custodian's margin application for approval.

Using margin as leverage magnifies both the favorable and unfavorable effects of price movements in the investments placed on margin, which may subject the portfolio holdings to a substantial risk of loss. If there is a sudden, steep drop in the value of one or more portfolio holdings, the aggregate value of a client's holdings may also decline. An additional risk is that we may not be able to liquidate assets quickly enough to meet margin or borrowing obligations during market declines. The obligation to meet additional margin or other payment requirements could worsen as the value of portfolio holdings declines.

Also, because acquiring and maintaining portfolio holdings on margin allows clients to hold positions that are worth significantly more than the investment in those positions, the amount that a client stands to lose in the event of adverse price movements is higher in relation to the amount of his/her investment. Also, since margin is a loan subject to interest, using margin increases account expenses.

Clients should refer to the margin agreement with the account custodian's clearing firm for all terms and conditions of a margin arrangement, including all related fees and expenses.

- **Options Transactions Risk.** Options are subject to risk factors that include but are not limited to volatility, lack of liquidity in underlying markets, state of the economy, and any legal, political, or geographic event that impacts the underlying security. The buying or selling of options involves the payment or receipt of a premium payment and the corresponding right or obligation, as the case may be, to either purchase or

sell the underlying security for a specific price at a certain time or during a certain period. Purchasing options involve the risk that the underlying security does not change in price in the manner expected so that the option expires worthless, and the investor loses the premium. On the other hand, selling options involve potentially greater risk because the investor is exposed to the actual price movement in the underlying investment in excess of the premium payment received. For more information regarding the risks associated with options, please read the Characteristics and Risks of Standardized Options brochure on this website: www.optionsclearing.com.

- **Risks Related to Real Estate Investment Trusts.** Investing in publicly traded real estate investment trusts involves risks similar to those associated with investing in the real estate industry. The performance of publicly traded real estate investment trusts (REITs) depends on the types, values, and locations of the properties it owns and how well those properties are managed. Some general risks include but are not limited to possible declines in the value of real estate, variations in rental payments, changes in interest rates, general and local economic conditions, increases in the rate of inflation, increases in property taxes and operating expenses, changes in zoning laws, costs resulting from the cleanup of environmental problems, and uninsured damages from floods, earthquakes or other natural disasters.

Since REITs may be invested in a limited number of projects or a particular market segment, these investments may be more susceptible to adverse developments affecting a single project or market segment than more broadly diversified investments. Additionally, loss of status as a qualified REIT under the U.S. federal tax laws could adversely affect the value of a particular REIT or the market for real estate investment trusts REITs.

- **Alternative Investment Risk.** Alternative investments are customarily illiquid. Generally, these investments are issued by companies that are not publicly traded, and consequently, in most cases, there is no public market for the shares or interests. Alternative investments are long-term investment vehicles that are highly speculative and only suitable for clients whose financial circumstances can endure significant losses. Investments in alternative strategies involve various additional risk factors, including, but not limited to, the potential for complete loss of principal, liquidity constraints, and lack of transparency.
- **Bitcoin ETF Risk.** Bitcoin and other cryptocurrencies, also referred to as “virtual currency,” “digital currency,” or “digital assets,” have no true or actual value but act as a medium of exchange where algorithms or specific peer-to-peer communities determine its value. If suitable for a client, we will purchase Bitcoin ETF or other ETFs that invest in Bitcoin and other cryptocurrencies. Therefore, clients will have exposure to bitcoin or other cryptocurrencies, directly or indirectly, through an investment such as an ETF or other investment vehicles.

Bitcoin EFTs do not invest in digital assets directly. These ETFs use derivatives such as Spot Bitcoin markets to value an ETF that invests in digital assets is likely to be highly volatile and subject to fluctuations due to several factors, including the price of bitcoin, manipulative trading activity on digital asset exchanges, which, in many cases, are largely unregulated, investor sentiment and expectations with respect to interest rates, the rates of inflation, and trading activities of large investors that invest directly or indirectly in bitcoin.

Generally, the investment objective of Bitcoin ETFs is to reflect the performance of the spot price of Bitcoin as measured using a benchmark, less expenses, and other liabilities. The value of bitcoin is determined based on the fair market value price for bitcoin, which reflects the execution price of bitcoin on the principal market where it is traded as determined by independent third-party digital asset data companies that provide the benchmark. The market price of Bitcoin and other cryptocurrencies has been subject to extreme fluctuations and experienced losses.

Purchases of Bitcoin ETFs or ETFs that invest in other digital assets are highly speculative and only suitable for clients whose financial circumstances can endure a loss of the entire investment. The ETF will typically process all creations and redemptions in transactions with financial firms that are authorized participants. Creation and redemption transactions will initially take place in cash. The authorized participants will

deliver only cash to create shares and will receive only cash when redeeming shares. If a broker-dealer or account custodian charges commissions, buying or selling of shares of the ETF will incur, customary brokerage commissions and charges. Trades may occur at a premium or discount relative to the net asset value (NAV) per share of the ETF. Nonetheless, authorized participants may cease to operate or shut down if the exchanges are subject to fraud, technical glitches, hackers, or malware.

Bitcoin ETFs or ETFs that invest in other digital assets or virtual currency involve significant risks, and such risks are similar to those involved with direct investment in digital assets or virtual currency, which are speculative securities. These investments also involve various additional risk factors, including, but not limited to, the potential for complete loss of principal, liquidity constraints, and lack of transparency.

- **General Risks Related to Digital Assets.** Digital assets, such as bitcoin and other cryptocurrencies, often referred to as “virtual currency” or “digital currency,” are mediums of exchange without actual value. These assets are not backed by a government-issued legal tender and the worth is determined by online, peer-to-peer networks where ownership and behavior are governed by participants. Digital currency exists on a blockchain, a type of shared and continually reconciled database that stores digital assets in a decentralized manner on the computers of certain users.

Price or Value Disparities. The price of digital assets is unstable and often impacted by the behavior of a small number of influential individuals or companies. The historical volatility of digital assets may be due to speculation regarding potential future appreciation in value, which could adversely affect prices. The potential for a rapid decline in the value of these assets is driven by the speculative nature and the influence of a few key individuals or entities on its price.

Regulatory Risk. Investors are not granted ownership rights in digital assets in the same manner as traditional investments that trade on regulated exchanges. Additionally, investors do not benefit from protections associated with federal and state securities laws. Furthermore, the uncertain and potentially changing tax treatment of digital assets could negatively impact the value of digital assets.

Cybersecurity Risk. Certain digital asset networks are subject to control by entities that capture a significant amount of the network’s processing power, a significant percentage of the digital asset issued and outstanding, or a significant number of developers or intermediaries important for the operation and maintenance of such digital asset network. Blockchain networks secured by a proof-of-work algorithm depend on the strength of the processing power of participants to protect the network. If a malicious actor or botnet (a volunteer or hacked collection of computers controlled by networked software coordinating the actions of the computers) obtains a majority of the processing power dedicated to mining on a digital asset network, it may be able to alter the blockchain on which the network and most transactions rely by constructing fraudulent blocks or preventing certain transactions from completing in a timely manner, or at all. The malicious actor or botnet could control, exclude, or modify transactions. A significant disruption in internet connectivity could also disrupt a digital asset’s network operations until the disruption is resolved, thereby having an adverse effect on the price of digital assets. Investments in digital assets directly or indirectly involve various additional risk factors, including the potential for liquidity constraints and the complete loss of principal.

- **Regulatory and Governmental Risk.** Changes in laws and regulations can change the value of securities. Certain industries are more susceptible to government regulation. If portfolio holdings are invested heavily in a particular sector or industry, correlating changes in zoning, tax structure, or specific industry regulations could impact returns or holdings.
- **Risks Related to Public Health Issues.** Our advisory business could be adversely affected materially by pandemics, epidemics, and global or regional outbreaks of disease, such as COVID-19, Ebola, H1N1 flu, H7N9 flu, H5N1 flu, or Severe Acute Respiratory Syndrome (SARS). More specifically, COVID-19 has spread rapidly worldwide since its initial emergence in December 2019 and has severely affected (and may adversely affect) the global economy and equity markets. Although we are unable to predict the long-term effects or consequences of COVID-19 or other epidemics, pandemics, and outbreaks of disease,

previous occurrences of other pandemics, epidemics, and outbreaks of disease have had a material adverse effect on the economies and markets of those countries and regions in which they were most prevalent.

Significant public health issues, including any occurrence or recurrence (or continued spread) of an outbreak of any epidemic, infectious disease, or virus, could cause a slowdown in the levels of economic activity generally (or cause the global economy to enter into a recession or depression), which would adversely affect our advisory business, financial condition, and operations. Should these or other major public health issues arise or spread further (or continue to spread or materially impact the day-to-day lives of persons around the globe), our firm could be adversely affected by more stringent travel restrictions, additional limitations on operations, or business and/or governmental actions limiting the movement of people between regions and other activities or operations.

- **Risks Specific to Third-party Asset Managers.** Investing clients' assets with another investment advisor involves risks. Such risks include the realization that the money managers are not as qualified as we believe them to be, that the securities or investment strategies that the money managers use are not as liquid as we would typically use in client's portfolios, or that the money manager's risk management guidelines are more liberal than we would typically employ. Additionally, the investment strategy implemented by a third-party money manager may involve an above-average portfolio turnover that could negatively impact the net after-tax gain experienced by a client. Also, portfolio holdings used in the money manager's investment strategy are usually exchanged or transferred without regard to clients' personal tax ramifications.
- **Reliance on Advisor.** The performance of clients' portfolio holdings depends on the skill and expertise of our professional staff to make appropriate investment decisions. The success of client portfolios depends on our firm's ability to develop and implement investment strategies and apply investment techniques and risk analyses to achieve a client's investment objectives. Our firm's subjective decisions may cause portfolios to incur losses or miss profit opportunities that may otherwise have been capitalized. For example, our portfolios may include customized investment features that may impact the implementation of specific investment strategies, including allocations to fixed income securities or alternatives. Additionally, as financial markets evolve, we may decide to invest in other securities when consistent with the specific portfolio strategy.
- **Business Continuity Risk.** Our advisory activities may be adversely impacted by a significant business disruption, unforeseeable event, or natural disaster that causes a total or partial outage affecting our offices or a technical problem affecting applications or networks. Service providers may also fail to perform, and our ability to conduct business may be curtailed by any disruption in the infrastructure that supports our operations.

To mitigate such risks, we have adopted a business continuity plan to implement recovery strategies designed to maintain critical functions and limit the impact of any business interruption or disaster on client activities or business transactions.

- **Cybersecurity Risk.** Our advisory services depend on various computer and telecommunication technologies, many of which are provided by or are dependent on third-party service providers. Systems or component failures could severely compromise our ability to operate successfully. Such possible failures include but are not limited to delays in data transmission, telecommunication failure, power loss, a software-related system crash, unauthorized system access or use (such as "hacking"), computer viruses, worms, and similar programs, fire or water damage, human errors in using or accessing relevant systems, or various other events or circumstances. These events may impact trading processes for investment portfolios. Providing comprehensive and foolproof protection against all such events is impossible. We cannot provide any assurance about the ability of applicable service providers to continue providing services.

Any event that interrupts our computers, telecommunication systems, or operations could compromise our services for an extended period and cause client advisory accounts to experience losses. This includes preventing trading, modifying, liquidating, and/or monitoring the portfolios.

Cyber incidents can generally result from deliberate attacks or unintentional events and are not limited to gaining unauthorized access to digital systems, misappropriating assets or sensitive information, corrupting data, or causing operational disruption, including denial-of-service attacks on websites. Cybersecurity failures or breaches that affect our advisory services or service providers can cause disruptions to our operations, potentially causing clients to experience financial losses, the inability to access advisory accounts, and other damages.

Notwithstanding the method of analysis or investment strategy employed by our firm, the assets within an investment portfolio are subject to the risk of devaluation or loss. There is no guarantee that portfolio holdings or investment assets will achieve the desired investment objectives. Please be aware that many different events can affect the value of assets or portfolio holdings, including but not limited to changes in the financial status of companies, market fluctuations, changes in exchange rates, trading suspensions and delays, economic reports, and natural disasters. While this information provides a synopsis of the events that may affect the value of investments, this is not an exhaustive listing.

There are inherent risks associated with investing, and depending on the risk occurrence, you may suffer the loss of all or part of your principal investment.

Recommendation of Specific Types of Securities

We do not focus our advice on or make recommendations relative to any particular type of security. Our advice encompasses an array of securities and investment vehicles.

DISCIPLINARY INFORMATION (Item 9)

Neither our firm nor management has been involved in industry-related legal or disciplinary events.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS (Item 10)

Financial Industry Activities

Our firm is not a registered broker-dealer, and we do not have an application pending for registration. Additionally, neither our management personnel nor investment advisor representatives are registered as or have applications pending to register as registered representatives.

Financial Industry Affiliations

Neither our management personnel nor investment advisor representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor, nor have applications pending to register as the foregoing or associated persons thereof.

Other Affiliations

Robert V. Sollis is a licensed insurance agent who offers and sells insurance products for asset and income protection. His offerings include life insurance, disability insurance, and fixed annuities. Many of the insurance products are sold through separate and distinct vendors. Mr. Sollis generally devotes up to ten percent (10%) of his workweek to selling insurance products.

In Mr. Sollis' capacity as an insurance agent, he receives separate yet customary compensation for insurance product sales. In instances where Mr. Sollis receives advisory fees in addition to insurance commissions, his compensation will be higher than if purchased separately or absent of the advisory fee component. Insurance products may be available through more cost-effective channels, and clients are not obligated to purchase any insurance products recommended by investment advisor representatives of our firm.

Acting in dual roles (insurance agent and investment advisor representative) and receiving compensation in dual capacities creates conflicts of interest. Accordingly, this is our notification of the conflicts of interest that result from the sale of insurance products. We will disclose applicable conflicts in writing prior to providing other services that create conflicts of interest. Additional information regarding Mr. Sollis' insurance activities and licenses are disclosed in his Brochure supplement. Please review Item 4, Other Business Activities, for specific details.

Our firm does not have an affiliated entity. Moreover, we do not have arrangements with a related person that is a broker-dealer, municipal securities dealer, government securities dealer or broker, investment company, or other pooled investment vehicle (including mutual fund, closed-end investment company, unit investment trust, private investment company, or "hedge fund," and offshore fund), other investment advisor or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, pension consultant, real estate broker or dealer, sponsor or syndicator of limited partnerships not already disclosed herein.

Other Investment Advisers

We select and recommend the services of sub-advisors who offer managed investment programs or model portfolios with various investment strategies. Please review Item 4, Third-party Asset Management Services, for more details. Sub-advisory agreements or solicitor's arrangements typically govern our arrangements, and as a result, clients enter into a separate agreement with the recommended sub-advisor.

As indicated in Item 5, Fees and Compensation, the advisory fees payable to our firm are either (1) pursuant to a sub-advisory agreement or (2) as a result of a solicitor's arrangement whereby we receive a referral fee (a portion of the aggregate advisory fee assessment) from the sub-advisor. It is important to note that clients do not incur any additional charges. We do not charge additional fees for recommending or referring clients to sub-advisors.

Our responsibility is to ensure that there are no conflicts of interest between our firm and the sub-advisor selected (i.e., there is no substantial concentration of products and services that create a direct or indirect benefit to our firm). Our chief compliance officer will evaluate programs and platforms periodically for conflicts of interest.

CODE OF ETHICS, PARTICIPATION, OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING (Item 11)

Code of Ethics

We require that all employees of Taurum Retirement Partners act ethically and professionally. Our management persons, investment advisor representatives, and other employees (collectively, "personnel") subscribe to a strict code of professional standards and ethics ("Code of Ethics"). Our Code of Ethics is constructed to comply with the investment advisory laws and regulations that require firms to act as fiduciaries in transactions with their clients. Our inherent fiduciary duty requires that we act solely in our clients' best interests and adhere to standards of utmost integrity in our communications and transactions. These standards ensure that clients' interests are given precedence.

Accordingly, we have implemented extensive policies, guidelines, and procedures that promote ethical conduct and practices by all of our personnel. The foregoing has been compiled and is collectively referred to as our Code of Ethics. We adopted our Code of Ethics to specify and prohibit certain types of transactions deemed to create conflicts of interest (or perceived conflicts of interest) and establish reporting requirements and enforcement procedures related to personal transactions by our personnel.

Our Code of Ethics outlines the business standards applicable to our fiduciary duty, professional norms, insider trading, personal trading, gifts, and gifts of entertainment, and establishes our ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust.

We will provide a copy of our complete Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

We do not recommend that clients buy or sell securities in which our firm, an affiliate, or a subsidiary entity has a material financial or ownership interest.

Personal Trading

Proprietary Trading

At times, we will buy or sell securities for our firm account and personal accounts of our employees that we have also recommended to clients. We will always document any transactions that could be construed as conflicts of interest. Conflicts of interest relative to trades for our firm account or employees' personal accounts may present in many different contexts. Some conflicts of interest related to personal trades include trading ahead to obtain a better transaction execution price than clients, making recommendations or trades based on financial interest, trading on information that is not available to the public, or structuring transactions in a manner so that the results are profitable for the firm's account or an employee's (or any related) personal account. To mitigate or remedy any conflicts of interest or perceived conflicts, we monitor internal trading reports for adherence to our Code of Ethics.

Simultaneous Trading

From time to time, we are likely to buy or sell investments for our firm account and the personal accounts of our employees at or around the same time as clients. As summarized above, our Code of Ethics requires us to (1) act in accordance with all applicable federal and state regulations, (2) act in the best interest of clients, (3) pre-clear transactions in private placements or initial public offerings, and (4) review personal securities transactions by employees to confirm adherence. Our chief compliance officer reviews personal securities transactions. In any instance where similar securities are purchased or sold, we will uphold our fiduciary duty by ensuring that transactions are beneficial to clients' interests.

BROKERAGE PRACTICES (Item 12)

Selection and Recommendation

We recommend account custodians after evaluating several factors. These factors include but are not limited to relatively low fees and expenses, execution capabilities, reputation, access to securities markets, and expertise in handling brokerage support processes. We may also consider the availability of other products and services that benefit our clients, many of which are not typically available to retail (non-advisory) clients.

Our firm maintains a custodial services agreement with Charles Schwab & Co., Inc. ("Schwab"). Schwab is a registered broker-dealer and a member of FINRA and SIPC. We are participants of Schwab's institutional services platform for independent investment advisors (known as Schwab Advisor Services™).

While we recommend that clients use Schwab as their account custodian, clients ultimately decide whether to do so and open an account by entering into an account agreement directly with Schwab. We do not open the account, although we may assist clients in doing so. As outlined in Item 5, Other Fees & Expenses, there are other costs and expenses related to managing the investments of clients' accounts and advisory service provisions.

Although Schwab generally does not charge clients separately for custody services, it is usually compensated by charging transaction fees on trades and assessing account maintenance fees. Schwab is also compensated by the interest it earns on the uninvested cash (i.e., Schwab money market mutual funds) in clients' accounts. Schwab may also be compensated by a client's investments in other products and services offered through Schwab Advisor Services™.

Schwab also makes available other products and services that benefit our firm but may not directly benefit clients' accounts. Services provided by Schwab are not otherwise contingent upon our firm committing any

specific amount of business to Schwab. The products and services assist us in managing and administering our clients' accounts. Such services include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our client's accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provides access to client account data (such as duplicate trade confirmations and account statements)
- Facilitates trade execution and allocation of aggregated trade orders for multiple client accounts
- Provides pricing and other market data
- Facilitates the payment of our fees from our clients' accounts
- Assists with back-office functions, recordkeeping, and client reporting

Additionally, Schwab offers other services to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Our firm may receive some of the services listed above, and in other cases, Schwab will arrange for third-party vendors to offer these services. Schwab may also discount or waive its fees for some of the services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as the occasional business entertainment of our personnel.

Therefore, as a result of our established service agreement, cost implications, operational support, and custodial and other services provided, Schwab receives preferential status in the recommendation of account custodians to our clients for our advisory transactions.

Notwithstanding the foregoing, we reserve the right to use other or additional firms for custodial services.

1. Soft Dollar Benefits

As a participant of an institutional services platform, we receive ancillary soft dollar benefits to support all of our advisory accounts and certain operational processes. The soft dollar benefits include but are not limited to duplicate client confirmations and bundled duplicate statements, access to a trading desk serving platform participants exclusively, and access to block trading, which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts, mechanisms to facilitate the deduction of advisory fees directly from client accounts, access to an electronic communication network for order entry and account information; receipt of compliance publications, and access to other products and services that are generally available to only institutional platform participants.

As of the date of this Brochure, we have not entered into any agreement with an account custodian, broker-dealer, or any other third party to receive soft dollar credits. Soft dollar credits are earned from clients' securities transactions as a result of an increase in transaction costs or commissions. They are subsequently used to pay for the research or other products or services provided by an account custodian. Therefore, although we receive ancillary soft dollar benefits, our firm does not earn soft dollar credits.

More importantly, our receipt of ancillary soft dollar benefits does not relieve us of our duty to act in the best interest of clients, which includes, among other things, seeking best execution of trades for client accounts.

2. Brokerage for Client Referrals

We do not receive client referrals from broker-dealers or other third parties in exchange for using any particular broker-dealer.

3. Directed Brokerage

(a) We recommend that clients utilize Schwab. Our service agreement with Schwab is designed to maximize trading efficiencies and cost-effectiveness on behalf of our clients. By recommending that clients use Schwab as an account custodian, we seek to achieve the most favorable results relative to trading costs, allocation of funds, and rebalancing client investments.

(b) We also permit clients to direct brokerage. If a client prefers a particular account custodian, we will notify the custodian of our advisor-client relationship and proceed accordingly. However, we are typically limited in negotiating transaction costs or obtaining best execution under such arrangements. Also, we are unable to aggregate trades, and the inability to do so creates disparities in transaction costs among clients who use our recommended account custodian versus clients who prefer to use their own. More importantly, there are likely to be higher costs associated with brokerage transactions under a directed arrangement.

Order Aggregation

In the ordinary course of business, we may (but are not obligated to) block or aggregate trade orders for advisory accounts. Commonly referred to as "block trading," this process is used to execute transactions more timely, equitably, cost-effectively, and efficiently. We typically do not block trades for new accounts since the advisory engagement of new clients and subsequent asset allocation determinations occur on different dates.

When we block or aggregate trades, we purchase or sell the same securities for several accounts. Upon execution, purchase and sell orders receive an average price, and shares are allocated proportionally among aggregated accounts. This practice is reasonably likely to result in an administrative convenience for our firm and an overall economic benefit to clients. Clients benefit relatively from averaged purchase or sell execution prices, beneficial timing of transactions, or a combination of these and other factors. This process also allows our firm to exercise more control over the execution by potentially avoiding any adverse effect on the price of a security that could result from simultaneously placing many separate, successive, and/or competing client trades. Block or aggregate trades do not ordinarily result in reduced advisory fees, lower transaction costs (if applicable), or the elimination of other expenses that clients incur as a result of trading for advisory accounts.

If we decide that order aggregation is in the best interest of clients, before aggregating trades, we will prepare a written allocation statement specifying each advisory account that will participate in the aggregated order and the anticipated allocation among the accounts if the order is filled completely. If the order is filled partially, allocations are made according to our judgment of each client's best interest, and our firm will document such allocation decisions. Each account participating in a block trade will pay or receive the average price for all shares included in the transactions for such securities on that day, including applicable transaction costs.

When allocating aggregated trades, we must treat each client fairly and equitably, and any change to an allocation must be explained in writing and approved by our chief compliance officer promptly, generally no later than one hour after the opening of the markets on the trading day after the day we executed the trade orders.

Our firm does not receive any additional compensation or remuneration as a result of trade order aggregation. The chief compliance officer will review transactions periodically to detect and prevent inefficiencies that result from non-compliance with our order aggregation policies and procedures.

REVIEW OF ACCOUNTS (Item 13)

Periodic Reviews

Our criteria for reviewing client accounts are as follows:

1. Portfolio Management Services

Robert V. Sollis, our firm's chief compliance officer, reviews client portfolio holdings. Our reviews consist of ongoing monitoring and analysis of funds and securities in accounts to determine whether a client's portfolio holdings and investment strategies continue to align with the documented investment goals and objectives. If reallocation of investments is necessary, we will adjust asset allocations or investment holdings. Formal reviews of portfolio holdings are conducted no less than annually.

2. Third-party Asset Management Services

We review the activity of sub-advisors no less than annually. Our chief compliance officer performs detailed reviews of client assets to ensure that the sub-advisor's investment allocation and risk tolerance align with the client's investment goals and objectives. Our review process includes reviewing investment management styles and specified risk/return requirements of the program. If reallocation is necessary, we may select or recommend a different sub-advisor.

Intermittent Review Factors

Substantial market fluctuation, economic, business, or political events, or changes in a client's financial status (such as retirement, termination of employment, relocation, or inheritance) will prompt us to conduct ad hoc reviews of holdings and accounts. Clients are urged to notify us promptly if there are material changes that affect the financial information that we rely on to provide advice and recommendations.

Client Reports

We issue separate performance reports to clients regarding their advisory accounts quarterly. In addition to performance data, these reports include statements of gains and losses and a financial market summary. It is recommended that clients review our performance statements carefully, comparing the asset values in our reports to those indicated in the account statements issued by the account custodian. It is also important to note that due to different accounting procedures, reporting dates, or valuation and pricing methodologies for certain securities, the asset values on our performance statements will vary from the values on the account custodian's statements.

In addition to our reports, clients receive transaction confirmations from the account custodian shortly after trading activity (buys or sells). Additionally, the account custodian will send monthly statements for each month in which there is trading activity. Clients will receive account statements quarterly if there is no monthly trading activity.

CLIENT REFERRALS AND OTHER COMPENSATION (Item 14)

Economic Benefits for Advisory Services

Other than ancillary soft dollar benefits disclosed in the Brokerage Practices Section (Item 12) above, we do not have arrangements to receive economic benefits from any third party for providing advisory services to our clients.

Compensation for Client Referrals

We do not compensate any person for client referrals.

CUSTODY (Item 15)

Custodian of Assets

Our firm does not hold physical custody of clients' funds or securities. We require that qualified account custodians hold clients' funds and securities in accounts for safekeeping. For more information regarding the account custodian that provides custody and safekeeping services for client accounts, please review the Brokerage Practices section (Item 12).

Nonetheless, our firm is deemed to have custody of client funds and securities because of our authorization and ability to deduct advisory fees directly from clients' accounts. We also have custody due to utilizing asset movement authorizations to process client requests for account disbursements. The foregoing forms of custody do not give our firm access to client funds and securities. Moreover, in all instances of custody, we have implemented the safeguard requirements of state regulations by ensuring the safekeeping of clients' funds and securities by a qualified account custodian and implementing the account custodian's requisite internal control procedures for safeguarding client assets.

Account Statements

Our firm does not provide account statements to clients. The account custodian sends monthly or quarterly electronic notifications to clients regarding the availability of account statements. Clients are advised to review account statements carefully, comparing asset values, activity, holdings, allocations, performance, and advisory fee deductions on current statements to the information in previously received account statements and trade confirmations.

INVESTMENT DISCRETION (Item 16)

Discretionary Authority

It is customary for our firm to exercise discretionary trading authority to manage and direct clients' investment assets (i.e., accounts, funds, and securities). This authority is granted upon a client's execution of our investment advisory agreement.

Discretionary trading authority is used to implement investment decisions regarding a client's investment assets without prior consultation with the client. Such investment decisions include determining the types and dollar amounts or percentages of securities bought or sold and reinvesting investment assets. All investment decisions implemented under discretionary authority are made in accordance with a client's documented investment objectives and risk tolerance. Upon a client's request, we may also use margin if the client has completed a margin application. We can also instruct the account custodian, broker-dealer, or trustee of the client's investment assets to accept and deliver securities or other assets to the client.

Clients may advise us of limitations on our discretionary authority in writing at any time during our advisory engagement. Clients may impose restrictions on investing in securities in specific industries or countries and limit the dollar amounts or percentages of investments in any asset class.

While we allow clients to advise us of the desire to impose restrictions, such restrictions will generally not apply to the management of the underlying securities in mutual funds and exchange-traded fund portfolio holdings, if applicable. Also, onerous limitations may adversely affect the third-party investment management platform's ability to manage a client's investment assets. Therefore, clients may be limited in imposing limitations because some restrictions may affect the outcome of our recommended portfolio management strategies. When clients impose onerous restrictions, we may exercise our option to terminate services as outlined in Item 5, Refund Policy. We will address each request on a case-by-case basis.

VOTING CLIENT SECURITIES (Item 17)

Our firm does not cast proxy votes on behalf of clients. We may provide information to clarify the issues in proxy solicitation materials; however, our clients are responsible for casting proxy votes. Clients are also responsible for directing shareholder action items relative to mergers, acquisitions, tender offers, bankruptcy proceedings, and other types of events about the securities held in accounts managed by us.

Clients receive proxy solicitation and information regarding shareholder action items by mail or electronically from the account custodian or issuer's transfer agent. Clients must follow the instructions for voting or directing the shareholder action outlined in the mailing or electronic delivery.

FINANCIAL INFORMATION (Item 18)

Balance Sheet Requirement

We do not require or solicit prepayment of more than \$1,200 in advisory fees per client six (6) months or more in advance. Moreover, our firm does not meet any custody requirement that would require us to submit our balance sheet.

Discretionary Authority, Custody of Client Funds or Securities and Financial Condition

We use discretionary trading authority to supervise and direct the investments of clients' accounts. Additionally, we have indirect custody of client funds and securities because of our authorization and ability to deduct advisory fees directly from clients' accounts. More importantly, we do not have any financial condition that will impair our ability to meet contractual commitments to clients.

Bankruptcy Petition Filings

Our firm has not been the subject of a bankruptcy petition during the past ten (10) years.

ADDITIONAL DISCLOSURES

This section covers other information related to our advisory business not specifically mentioned previously.

Important Information Regarding Retirement Accounts

ERISA Fiduciary Advisor

As a result of providing fiduciary investment advice to plan sponsors, plan participants, and IRA owners, our firm is a Fiduciary Advisor under Title I of the Employee Retirement Income Security Act of 1974, as amended (ERISA) and as applicable, the Internal Revenue Code of 1986, as amended (the Code). For details regarding our services for retirement savings accounts, please review the Types of Advisory Services Section herein. We will provide additional disclosures at the time of providing advice or making recommendations regarding any retirement savings account.

Retirement Account Rollover Options

Clients have options regarding retirement account rollovers. Existing or new clients leaving an employer typically have four (4) options regarding assets in an existing retirement plan. They may:

1. roll over the assets to the new employer's plan, if available, and rollovers are permitted;
2. leave the assets in the former employer's plan, if permitted;
3. roll over the assets to an Individual Retirement Account ("IRA"); or
4. cash out the account value (tax consequences generally apply).

If we recommend that a client roll over retirement assets into an account our firm will manage, such a recommendation creates a conflict of interest because we earn fees as a result of the rollover. As a Fiduciary Advisor, our firm mitigates this conflict by disclosing it and ensuring that a recommendation to roll over retirement savings is in a client's best interest.

No client is under any obligation to roll over retirement savings to an account managed by our firm.

CFP Board Disclosures

Our firm employs a CERTIFIED FINANCIAL PLANNER™ professional, Jackson T. Beck, CFP®. Please review Mr. Beck's Brochure supplement below for details regarding the conferment of the CFP® professional designation. Accordingly, we also adhere to the CFP Board's Standards of Professional Conduct.

We encourage clients to review all of the information outlined in this Brochure, our disclosure document. We welcome any questions that clients may have regarding our advisory services (Item 4 - Advisory Services), compensation (Item 5 - Fees and Compensation), and conflicts of interest (Item 10 - Other Financial Industry Activities and Affiliations).

In the event of material changes to the information outlined in this Brochure, we will provide updates and amendments to clients within a reasonable time frame, generally within thirty (30) days as required by advisory regulations. We acknowledge our responsibility to adhere to the standards established by the CFP Board's Standards of Professional Conduct, including the duty of care of a fiduciary, as defined by the CFP Board.

This Brochure supplement provides information about investment advisor representative, Robert V. Sollis, CRD No. [4131485](#) that supplements the firm brochure of Taurum Retirement Partners, LLC, CRD No. [282017](#). You should have received a copy of that brochure. Please contact Robert V. Sollis (see contact information below), if you did not receive the Taurum Retirement Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about investment advisor representative, Robert V. Sollis, CRD No. [4131485](#) can be found on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. This website can be searched by using the investment advisor representative's CRD number (shown above).

BROCHURE SUPPLEMENT

(Form ADV Part 2B)

for

Robert V. Sollis, ChFC®

Taurum Retirement Partners, LLC
1921 S Alma School Road, Suite 308
Mesa, Arizona 85210
Phone: (480) 626-2501
Fax: (480) 895-1999
Website: www.taurumfinancial.com
Email: rob@taurumfinancial.com

June 6, 2024

BROCHURE SUPPLEMENT for Robert V. Sollis, ChFC® CRD No. 4131485**EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE (Item 2)**

Taurum Retirement Partners Requirements for Representative Employment

We require that employees who provide advice on behalf of the firm have at least two (2) years of relevant work experience in the securities industry. Additionally, prospective employees must have passed the requisite state advisory exam or earned a qualifying professional designation.

Investment Advisor Representative's Information**Robert V. Sollis, ChFC®****Year of Birth: 1979**

Robert V. Sollis formed Taurum Retirement Partners in 2016 to provide holistic investment advisory services to clients. Mr. Sollis has over 20 years of financial services industry experience, during which time he developed a specialty in wealth management philosophies (e.g., financial planning, investment management, etc.).

Educational Background

Financial Planning Education Program | Kaplan Schweser University | La Crosse, Wisconsin | 2012

Professional Designations**Chartered Financial Consultant (ChFC®) Designation, American College, 2016**

The ChFC® is a professional designation conferred by the American College that measures the competency of financial planners. The ChFC® designation is awarded upon completion of nine (9) self-study courses covering key financial planning disciplines, including insurance, income taxation, retirement planning, investments, and estate planning, and at least three (3) years of full-time industry experience.

Business Experience

<i>Managing Member, Investment Advisor Representative & Chief Compliance Officer</i>	<i>2016 - Present</i>
Taurum Retirement Partners, LLC Mesa, Arizona	
<i>Investment Advisor Representative</i>	<i>2012 – 2015</i>
Gallacher Capital Management, LLC d/b/a Allay Financial Services, LLC Gilbert, Arizona	
<i>Registered Representative</i>	<i>2012 – 2015</i>
LPL Financial LLC Gilbert, Arizona	
<i>Account Executive/Financial Representative</i>	<i>1999 - 2012</i>
Fidelity Investments Salt Lake City, Utah	

DISCIPLINARY INFORMATION (Item 3)

Criminal or Civil Actions. None.

Administrative Actions or Proceedings. None.

Self-Regulatory Organization (SRO) Proceedings. None.

Professional Standards Violations. None.

OTHER BUSINESS ACTIVITIES (Item 4)

Investment Related

Mr. Sollis is not involved in any investment-related activity not already disclosed herein.

Non-Investment Related

Mr. Sollis is also a licensed insurance agent (AZ License No. 15942564) who transacts life, accident & health, or sickness insurance product sales through various insurance vendors. Mr. Sollis earns separate yet customary compensation for insurance product sales. He spends up to ten percent (10%) of his workweek selling insurance products. See Item 10 of the Brochure for details regarding Mr. Sollis' conflicts of interest related to insurance transactions.

ADDITIONAL COMPENSATION (Item 5)

Mr. Sollis does not receive economic benefits from any third party for providing advisory services to clients.

SUPERVISION (Item 6)

Robert V. Sollis is our firm's chief compliance officer. Accordingly, he is responsible for providing advice to clients as an investment advisor representative, supervising other staff, administering operations, and ensuring the application of our written supervisory policies and procedures.

For questions regarding our supervisory practices, contact Rob by phone at (480) 626-2501 or by email. His email address is rob@taurumfinancial.com.

This Brochure supplement provides information about Investment Advisor Representative, Jackson T. Beck, CRD No. [6470399](#) that supplements the firm brochure of Taurum Retirement Partners, LLC, CRD No. [282017](#). You should have received a copy of that brochure. Please contact our chief compliance officer, Robert V. Sollis if you did not receive the Taurum Retirement Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Investment Advisor Representative, Jackson T. Beck, CRD No. [6470399](#) can be found on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. This website can be searched by using the investment advisor representative's CRD number (shown above).

BROCHURE SUPPLEMENT

(Form ADV Part 2B)

for

Jackson T. Beck, CFP®

Taurum Retirement Partners, LLC
1921 S Alma School Road, Suite 308
Mesa, Arizona 85210
Phone: (480) 626-2501
Fax: (480) 895-1999
Website: www.taurumfinancial.com
Email: jackson@taurumfinancial.com

Supervisory Contact
Robert V. Sollis, ChFC®
Chief Compliance Officer
Email: rob@taurumfinancial.com

June 6, 2024

BROCHURE SUPPLEMENT for Jackson T. Beck CFP® CRD No. 6470399

EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE (Item 2)

Taurum Retirement Partners Requirements for Representative Employment

We require that employees who provide advice on behalf of the firm have at least two (2) years of relevant work experience in the securities industry. Additionally, prospective employees must have passed the requisite state advisory exam or earned a qualifying professional designation.

Investment Advisor Representative's Information

Jackson T. Beck, CFP®

Year of Birth: 1994

Educational Background

Bachelor of Science | Economics | Utah State University | Logan, Utah | 2017

Professional Designations

Certified Financial Planner or CFP®, 2018

Certified Financial Planner, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by the Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

Education – Complete an advanced college-level course of study addressing the financial planning subject areas that the CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;

Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

Ethics – Agree to be bound by the CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks.

Business Experience

Investment Advisor Representative
Taurum Retirement Partners, LLC
Mesa, Arizona

2017 to Present

Administrative Associate Taurum Retirement Partners, LLC Gilbert, Arizona	2016 – 2017
Partner Sluffin It Consulting Gilbert, Arizona	2015 – 2017
Administrative Associate Gallacher Capital Management, LLC d/b/a Allay Financial Services, LLC Gilbert, Arizona	2015 – 2015
Missionary Church of Jesus Christ of Latter-day Saints Salt Lake City, Utah	2013 – 2015

DISCIPLINARY INFORMATION (Item 3)

Criminal or Civil Actions. *None.*

Administrative Actions or Proceedings. *None.*

Self-Regulatory Organization (SRO) Proceedings. *None.*

Professional Standards Violations. *None.*

OTHER BUSINESS ACTIVITIES (Item 4)

Mr. Beck is not involved in any investment related (or non-investment related) activity not already disclosed herein.

ADDITIONAL COMPENSATION (Item 5)

Mr. Beck does not receive economic benefits from any third party for providing advisory services to clients. Nonetheless, in May of 2020, Jackson T. Beck received a loan in the amount of \$9,000 under the Paycheck Protection Program (PPP). The coronavirus pandemic economically impacted his book of business, and the loan proceeds were used for salary and business expenses during these challenging times. Mr. Beck's PPP loan was forgiven on August 4, 2021.

SUPERVISION (Item 6)

Robert V. Sollis, our firm's chief compliance officer, supervises Jackson T. Beck. We administer supervision by applying our written supervisory policies and procedures.

For questions regarding our practices, contact Robert V. Sollis by phone at (480) 626-2501 or by email. His email address is email: rob@taurumfinancial.com.