



trueNorth Wealth Advisors

Form ADV Part 2 Brochure

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This Form ADV Part 2A brochure provides information about the qualifications and business practices of trueNorth Financial Services, LLC, doing business as trueNorth Wealth Advisors. If you have any questions about the contents of this brochure, please contact us at 206-652-4314 or info@truenorthwa.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about trueNorth Wealth Advisors is also available on the SEC's website at www.adviserinfo.sec.gov. Our CRD number is 118273. trueNorth Wealth Advisors is a registered investment advisor. Registration as an investment advisor does not imply any certain level of skill or training.

Material Changes (Item 2)

This section of the brochure helps you quickly identify material changes from the last annual update.

Since the last update of this brochure on February 15, 2015, we have made non-material changes throughout the document, so please review the entire document.

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Advisory Business (Item 4)

This section of the brochure tells you about our business, including ownership, and a description of the services we offer.

trueNorth Wealth Advisors is referred to in this document as “trueNorth”, “the Company”, “us”, “we”, or “our”. In this document we refer to current and prospective clients of trueNorth as “you”, “client”, or “your”. trueNorth was founded in 2001 and registered as an investment advisor in 2002 and is owned by its two principals, Karen O’Brien and Joe Hebert. In addition to its two principals, Brooke Trinh is trueNorth’s Client Service Manager. A description of their education and business background is provided in Item 19 of this document.

Types of Advisory Services

Investment Advisory Services

Investment Advisory Services provides professional investment management of your portfolio and is designed for clients with at least \$250,000 in manageable assets; however, it is only a guideline, not an account minimum. Clients are accepted at trueNorth’s discretion.

trueNorth and our investment adviser representatives provide asset management services on a continuous and ongoing basis guided by the individual needs of our clients. Using the information provided by you, the investment advice provided to you is tailored to your individual situation. We regularly inquire about, and you are responsible for providing, information about your investment goals, time horizon, and risk tolerance.

Investment Advisory Services include developing an Investment Policy Statement to establish guidelines for managing the assets identified as “Assets Under Management”. Asset allocation, risk tolerance, time horizons and tax considerations are identified in the Investment Policy Statement.

These investment supervisory services are generally not provided to all your holdings or net worth but rather only to assets specifically designated by you and agreed to by us as managed assets.

As a courtesy, trueNorth allows clients to hold non-managed, non-discretionary accounts with Schwab Institutional under the aegis of trueNorth Wealth Advisors. Management of assets in courtesy non-managed, non-discretionary accounts is the sole responsibility of the client.

Financial Planning

We offer hourly financial planning and fixed fee comprehensive financial planning for clients that have engaged trueNorth for Investment Advisory Services.

For clients who engage trueNorth on an hourly basis, a Financial Planning Agreement and Scope of Services are signed by each client(s) to establish the nature of the relationship and provide a description of the services that will be performed. An investment analysis may

or may not be provided for clients with a Scope of Service that is limited to a specific issue(s) rather than a comprehensive financial plan.

Hourly financial planning fees are determined on a per engagement basis and are based on our standard hourly rates in effect at the time the Financial Planning Agreement is signed.

For clients who engage trueNorth for a fixed fee comprehensive financial plan, a Financial Planning Agreement and Scope of Services-Comprehensive Plan are signed by each client(s) to establish the nature of the relationship and provide a description of the services that will be performed.

A comprehensive financial plan typically includes retirement planning, investment planning, tax planning, insurance planning, estate planning, and if needed, education planning. The fee is based on the complexity of the situation and the estimated time it will take us to complete the comprehensive plan.

Some clients are provided a written plan that may include a personal balance sheet and certain projections. Any reports, financial statement projections, and analyses are intended exclusively for your use in developing and implementing your financial plan. In view of this limited purpose, the statements should not be considered complete financial statements. trueNorth will not audit, review, or compile financial statements, and accordingly, we will not express an opinion or other form of assurance on them, including the reasonableness of assumptions and other data on which any prospective financial statements are based. It is likely that there will be material differences between projected and actual results because events vary, and circumstances frequently do not occur as expected.

Our analyses will be highly dependent on certain economic assumptions about the future. Therefore, you should establish familiarity with historical data regarding key assumptions such as inflation and investment rates of return, as well as an understanding of how significantly these assumptions affect the results of our analyses. We may counsel you as to the consistency of your assumptions with relevant historical data, but we will not express any assurance as to the accuracy or reasonableness of your specific data and assumptions. You are ultimately responsible for the assumptions and personal data upon which our procedures and projections are based. The financial plan assumptions and reports are primarily a tool to alert you to certain possibilities. The reports are not intended to nor do they provide any guarantee about future events including your investment returns. The implementation of the plan is solely your responsibility.

The financial plans provided for some of our clients do not address all potential aspects of financial planning. Typically our plans address determination of financial objectives, identification of financial problems, cash flow planning, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Our services are provided on a fee-only basis. We don't sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. We are not

affiliated with entities that sell financial products or securities. We don't accept commissions or finder's fees.

We provide each client with a written evaluation of their financial situation via a comprehensive financial plan or limited scope financial notes. Once the planning services that were identified in the Scope of Services have been completed, no further financial planning will be performed unless requested by the client.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by you on an as-needed basis. Fees charged by any other professionals you engage are separate from and in addition to our fee. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

Wealth Advisory Services

Wealth Advisory Services are available for clients who retain trueNorth for both Financial Planning Services and Investment Advisory Services and are designed for clients with at least \$1,000,000 manageable assets; however, it is only a guideline, not an account minimum. Clients are accepted at trueNorth's discretion. A Wealth Advisory Services Agreement is signed by each client(s) to establish the nature of the relationship and provide a description of the services that will be performed.

Financial Planning Services include developing the initial comprehensive financial plan in the first year and ongoing financial planning support in subsequent years. Assistance with financial plan implementation and on-going telephone, e-mail, and meeting support for any financial planning related issue that arises between regularly scheduled meetings is available upon request.

Periodic reviews are also offered to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

The initial introductory meeting is free of charge and is considered an exploratory interview to determine if the financial planning and investment management services needed by the client are a good fit for the services provided by trueNorth.

Advice on Matters Not Involving Securities

trueNorth may from time to time provide advice on topics not involving securities. This advice may relate to insurance or risk management. The fees for this advice may be included as part of financial planning services. Non-securities related advice is only provided to you upon specific written request and agreement between us. Not all clients receive this type of advice.

As of December 31, 2015, trueNorth manages approximately \$56,548,000 in assets on a discretionary basis.

Types of Investments Used

We consider many different types of securities when formulating the investment advice we give to you. If you come to us with existing investments, we evaluate them with respect to your financial goals, risk tolerance, and investment time horizon. Depending upon your situation, your account(s) managed by us may contain equities (stocks), corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), exchange traded funds (ETFs), and U.S. government securities.

Tailored Services and Investment Restrictions

We attempt to tailor your investment portfolio to your situation as you have described it to us. This is why it is so important that you let us know about changes to your financial situation, goals, or investment time horizon. You may impose restrictions on investing in certain securities or types of securities. You must clearly identify these restrictions in writing to us.

Fees and Compensation (Item 5)

This section of the brochure describes how we are compensated for the services we offer.

Compensation Methodology and Rates

Investment Advisory Services

Clients who engage us for Investment Advisory Services receive ongoing professional portfolio management. These clients are charged for our services based on a percentage of the assets being managed. The following schedule is our standard fee schedule for Investment Advisory Services. The annual fee arrangement will be described in the Investment Advisory Services Agreement entered into between trueNorth and you and is not negotiable. Clients with unexpired contracts may have different services and fee structures depending on the date the Agreement was signed. A lower fee for a comparable service may be available from other sources.

Assets Under Management	Annual Fee
\$0 to \$1,000,000	0.8% of Portfolio Value
Over \$1,000,000	\$8,000 + 0.5% of Portfolio Value

For example, the total annual fee for a \$1,500,000 portfolio will be \$10,500 (\$2,625 per quarter) or 0.70% of the assets under management.

You may terminate the Investment Advisory Agreement without fee or penalty by providing written notice to trueNorth within five (5) business days from your execution of the agreement. Thereafter, either party may terminate the Investment Advisory Agreement by providing thirty (30) day written notice. Any unearned fees collected in advance of services being performed will be returned to you on a pro rata basis.

Financial Planning Fees

For clients who have engaged trueNorth for Investment Advisory Services, we offer financial planning on an hourly and fixed fee basis.

Hourly Fees

Limited scope planning engagements are billed on an hourly basis. Hourly financial planning fees are determined on a per engagement basis and are based on our standard hourly rates in effect at the time the Financial Planning Agreement is signed.

Our current hourly rates are \$200 for a principal and \$100 for planning support.

The price of the service is based upon the amount of time to complete the service times an hourly rate. The tasks and services to be performed are described in a Scope of Service that is signed by you and trueNorth that also includes the hourly rate, an estimate of time to complete the project, and the procedure for refund or partial billing if the engagement is terminated before completion. If a financial planning engagement is terminated before completion, fees will be charged at the standard hourly rate for all work completed prior to termination.

Fixed Fee

Comprehensive financial plans are prepared for a fixed fee. The fee is based on the estimated time it will take us to complete the comprehensive plan at our standard hourly rates including research, meeting preparation, and plan meetings. The services to be performed and planned meetings are described in a Scope of Service that is signed by you and trueNorth. If a financial planning engagement is terminated before completion, fees will be charged for all work completed prior to termination.

Comprehensive financial plan fees range from \$4,000 to \$6,000 depending on the complexity of the situation.

Wealth Advisory Services

Clients who hire us for Wealth Advisory Services receive both financial planning advice and portfolio management services. These clients are charged for our services based on a percentage of the assets being managed. The following schedule is our standard fee schedule for Wealth Advisory Services. The annual fee arrangement will be described in the Wealth Advisory Services Agreement entered into between trueNorth and you and is not negotiable. Clients with unexpired contracts may have different services and fee structures depending on the date the Agreement was signed. A lower fee for a comparable service may be available from other sources.

Assets Under Management	Annual Fee
\$0 to \$1,000,000	1.0% of Portfolio Value
Over \$1,000,000	\$10,000 + 0.5% of Portfolio Value

For example, the total annual fee for a \$1,500,000 portfolio receiving Wealth Advisory Services will be \$12,500 (\$3,125 per quarter) or 0.83% of the assets under management.

You may terminate the Wealth Advisory Agreement without fee or penalty by providing written notice to trueNorth within five (5) business days from your execution of the agreement. Thereafter, either party may terminate the Investment Advisory Agreement by providing thirty (30) day written notice. Any unearned fees collected in advance of services being performed will be returned to you on a pro rata basis.

The asset based fees for Wealth Advisory Services and Investment Advisory Services are billed quarterly, in advance, based on the value of the account at the end of the quarter. If the management agreement does not span the entire quarterly billing period, the fee will be prorated based on the number of days the account is open during the billing period. Your account custodian will send client statements, at least quarterly, showing all disbursements for the account including the amount of the advisory fee, if deducted directly from the account. We urge you to review your account statements to verify the accuracy of the fee calculation as the account custodian will not determine whether the fee has been properly calculated. See Brokerage Practices (Item 12) in this brochure for more information about your account custodian(s).

Valuation of Publicly Traded Securities

Publicly traded securities in your account(s) managed by us are held at the custodian that we recommend but are ultimately chosen by you. We use the securities valuation provided by the independent qualified custodian for reporting and billing purposes. Publicly traded securities are usually valued as of the end of business on the last trading day of the calendar quarter.

How Clients Pay Advisory Fees

Investment Advisory Services and Wealth Advisory Services fees are generally deducted directly from your account. You must provide your qualified account custodian with written authorization to have fees deducted from your account and paid to trueNorth. We will send you an invoice each time our fee is deducted from your account that describes the fee and how it was calculated.

Fees for hourly financial planning services are due and payable upon delivery of the service. Fees for a fixed fee comprehensive plan will be billed in four installments at the completion of each primary meeting and is due upon receipt.

Other Types of Fees and Expenses

In addition to the investment advisory fees you pay to us, you will pay transaction fees (commissions) to your custodian or broker-dealer for executing securities transactions and charges for special services elected by you or trueNorth. These fees may include:

- periodic distribution fees
- electronic fund and wire transfer fees
- certificate delivery fees
- reorganization fees
- account transfer fees (outbound)

- returned check fees
- international security transfer fees
- overnight mail and check fees
- Rule 144 transfer fees
- transfer agent fees

This list is not meant to be all inclusive. Any fee on a special service incurred by the client will be fully disclosed. Please refer to Item 12 of this document for an explanation of our brokerage practices.

Investment Company Fees

Investment company funds (e.g., mutual funds or ETFs) that are held by you will bear their own internal transaction and execution costs, as well as directly compensate their investment managers along with internal administrative services. Some funds pay 12b-1 fees, distribution fees, and/or shareholder service fees to broker-dealers that offer investment company funds to their clients. These fees affect the net asset value of the fund shares and are indirectly borne by fund shareholders such as you.

Some fund companies have imposed a redemption fee. A redemption fee is another type of fee that some funds charge their shareholders when shares are sold or redeemed within a short period of time from the purchase of the fund shares. Although a redemption fee is deducted from redemption proceeds just like a deferred sales load, it is not considered to be a sales load. Unlike a sales load, which is generally used to compensate brokers, a redemption fee is typically used to defray fund costs associated with a shareholder's redemption and is paid directly to the fund, not to a broker. The SEC generally limits redemption fees to 2%. In most cases, the funds will use the "first-in, first-out" (FIFO) method to determine the holding period. Under this method, the date of the redemption will be compared with the earliest purchase date of shares held in the account. While it is not the general practice of trueNorth to sell client's securities in a period that would generate a redemption fee we might do so if we believe the sale is in your best interests, or if fund shares must be redeemed to pay fees from the account.

A complete explanation of these charges is contained in the Prospectus and Statement of Additional Information for each investment company fund. You can get a prospectus through the investment company website, by telephone, or by mail.

Commission Based Compensation

Our investment advisor representatives do not receive any commission based compensation while providing investment advisory services to you.

Performance-Based Fees and Side-By-Side Management (Item 6)

This section of the brochure explains any performance-based fees we may charge you for and how they may be different from other clients' charges.

trueNorth does not charge fees that are based upon a share of capital gains or capital appreciation of client assets. We provide investment advisory services to other clients in addition to you. Not all clients receive the same investment advice, nor do they pay the same fee. We will act in the best interests of each of our clients at all times.

Types of Clients (Item 7)

This section of the brochure describes who we generally provide our services to.

Individuals

trueNorth provides advisory services to a variety of types of clients including individuals, trusts, and estates. We do not currently impose a minimum account size requirement.

Methods of Analysis, Investment Strategies, and Risk of Loss (Item 8)

This section of the brochure explains how we formulate our investment advice and manage client assets.

Methods of Analysis

We use the fundamental analysis method of security analysis.

We analyze an investment by examining its publically available financial statements or reports, its management, competitive advantages, competitors, and markets. Our fundamental analysis method is based upon the assumption that markets may misprice an investment in the short run but generally the “market” price of a security is an accurate reflection of what that security is worth. The main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, prospectuses, Value Line, and Morningstar Principia mutual fund and stock information.

Investment Strategies

The primary investment strategy used with client accounts is strategic asset allocation utilizing broadly diversified passive and actively managed mutual funds and exchange traded funds. Portfolios are globally diversified.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. You may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

Risks

Risks Associated with Financial Planning

Risks associated with the financial planning process include the possibility that the investment performance, interest rates, inflation assumptions, and longevity assumptions used in the development of your financial plan turn out to be materially different than the actual future investment performance, interest rate, inflation and life span. Differences between the assumptions used in your plan and actual events can materially affect the results of your financial plan over long periods of time. While we base our assumptions on historical information, you must acknowledge that past performance or events might not be indicative of the future.

Risks

General Risks to Investing

Investing is not without risk, and involves the risk of loss of principal which you should be prepared to bear. We use several strategies to try to reduce risk, including diversifying a portfolio across multiple asset classes. Despite these strategies, historical evidence clearly shows that every asset class has experienced severe declines in value—sometimes sustained over many years—throughout several periods of time in history. In addition, each of our strategies to minimize risk may not achieve that goal as the benefits of diversification decline if asset classes become more correlated. As with any investment, you could lose all or part of your investments managed by trueNorth, and your account's performance could trail that of other investments.

Asset Class Risk

Securities in your portfolio(s) or in underlying investments such as mutual funds may underperform in comparison to the general securities markets or other asset classes.

Issuer Risk

Your account's performance depends on the performance of individual securities in which your account invests. Any issuer may perform poorly, causing the value of its securities to decline. Poor performance may be caused by poor management decisions, competitive pressures, and changes in technology, disruptions in supply, labor problems or shortages, corporate restructurings, fraudulent disclosures, or other factors. Changes to the financial condition or credit rating of an issuer of those securities may cause the value of the securities to decline.

Management Risk

The performance of your account is subject to the risk that our investment management strategy may not produce the intended results.

Market Risk

Your account could lose money over short periods due to short-term market movements and over longer periods during market downturns. The value of a security may decline due to general market conditions, economic trends, or events that are not specifically related to the issuer of the security or to factors that affect a particular industry or industries. During

a general downturn in the securities markets, multiple asset classes may be negatively affected.

Passive Investment Risk

trueNorth may use a passive investment strategy that is not actively managed where we do not attempt to take defensive positions in declining markets.

Liquidity Risk

A security may not be able to be sold at the time desired without adversely affecting the price.

Smaller Company Securities Risk

Securities of companies with smaller market capitalizations, historically, tend to be more volatile and less liquid than larger company stocks. Smaller companies may have no or relatively short operating histories, or be newly public companies. Some of these companies have aggressive capital structures, including high debt levels, or are involved in rapidly growing or changing industries, or new technologies, which pose additional risks.

Interest Rate Risk

An increase in interest rates may cause the value of fixed income securities and funds that hold these securities to decline in value. Securities with longer durations tend to be more sensitive to interest rate changes, usually making them more volatile than securities with shorter durations. To the extent that your account is invested in fixed income securities with longer-term durations or funds holding these securities, rising interest rates may cause the value of these investments to decline significantly.

Inflation Risk

When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

Currency Risk

Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Reinvestment Risk

This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

Business Risk

These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

Financial Risk

Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information (Item 9)

This section of the brochure lists legal and disciplinary information for trueNorth, its owners, and management team.

Neither trueNorth nor any of our owners or management team members or staff has been involved in any civil or criminal investment-related events.

Other Financial Industry Activities and Affiliations (Item 10)

This section of the brochure describes other financial services industry affiliations we may have that could present a conflict of interest with you.

trueNorth does not have any material business affiliations within the financial services industry.

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

This section of the brochure describes our code of ethics, adopted pursuant to SEC rule 204A-1, and how we deal with client and related person trading.

Code of Ethics

We have adopted a code of ethics designed to prevent and detect violations of securities rules by our employees and affiliated persons. Our controls in this area focus upon securities transactions made by our employees that have access to material information. We will provide a copy of our code of ethics to clients or prospective clients upon request.

Material Financial Interest and Personal Trading

From time-to-time the interests of the principals and employees of trueNorth may coincide with yours and other clients. Individual securities may be bought, held, or sold by a principal or employee of trueNorth that is also recommended to or held by you or another client. Buying the same investments as our clients presents a conflict of interest with clients. To address this risk, our Investment Advisor Representative will purchase or sell securities after clients if s/he trades the same security on the same day. If potential insider information is inadvertently provided or learned by a principal or employee, it is our policy to strictly prohibit its use.

It is acknowledged and understood that we perform investment services for different types of clients with varying investment goals, risk profiles, and time horizons. As such, the investment advice offered to you may differ from other clients and investments made by our investment advisor representatives. While we always will act in your best interest, we have no obligation to recommend for purchase or sale a security that trueNorth, its principals, affiliates, employees, or investment advisor representatives may purchase, sell, or hold. When a decision is made to liquidate a security from all applicable accounts, priority will always be given to client orders before those of a related or associated person to trueNorth. We have procedures for dealing with insider trading, employee-related accounts, “front running” and other issues that may present a potential conflict when buy/sell recommendations are made. These procedures include reviewing employee security transactions and holdings to eliminate, to the extent possible, the adverse effects of potential conflicts of interest on clients.

Brokerage Practices (Item 12)

This section of the brochure describes how we recommend broker-dealers for client transactions.

Factors Considered When Recommending Charles Schwab & Co., Inc. as Your Qualified Custodian

trueNorth does not maintain custody of your assets that we manage; although we may be deemed to have custody of your assets if you give us authority to deduct periodic investment advisory fees from your account (see *Item 15 – Custody*, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. Primarily we recommend that our clients use Charles Schwab & Co., Inc. (“Schwab”), a registered broker-dealer, Member SIPC, as the qualified custodian. We might also recommend other custodians in certain circumstances where it is in the best interest of the client. We are independently owned and operated and are not affiliated with Schwab or any custodian. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use a custodian/broker, you will decide whether to do so and will open your account with the Custodian by entering into an account agreement directly with them. We do not open the account for you, although we may help you do so.

How We Select Brokers/Custodians

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)

- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds, etc.)
- Availability of investment research and tools that help us make investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us

Your Brokerage and Custody Costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab's commission rates applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a minimum amount of their assets in accounts at Schwab. This commitment benefits you because the overall commission rates you pay are lower than they would be otherwise. In addition to commissions, Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How We Select Brokers/Custodians").

Products and Services Available to Us From Schwab

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab's business serving independent investment advisory firms like us. They provide us with access to its institutional brokerage—trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services generally are available on an unsolicited basis (we don't have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab.

Services That Benefit You

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your

account.

Services That May Not Directly Benefit You

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They 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 clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

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

Services That Generally Benefit Only Us

Schwab also offers other services intended 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

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The \$10 million minimum may give us an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How We Select Brokers/Custodians") and not Schwab's services that benefit only us.

Some of the products or services provided by Schwab do not qualify for the safe harbor in section 28(e) of the Securities Exchange Act of 1934, including those services that do not aid in investment decision-making or trade execution. These business management and development services, in addition to those listed above, may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, the Custodian may use independent third parties to offer these services to trueNorth. Schwab may discount or waive fees it would otherwise charge for some of these business management and development services or pay all or a part of the fees of a third-party providing these services to us. Schwab may charge commissions (or markups or markdowns) higher than those charged by other broker-dealers in return for services and benefits. trueNorth does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Brokerage for Client Referrals

trueNorth does not have any agreements in place where securities transactions are directed to particular broker-dealers in exchange for client referrals.

Aggregated Orders

When we decide to purchase or sell a specific security for multiple clients at the same time, we will consider aggregating, or combining the orders. This procedure will result in a single average price for all client transactions in the aggregated order. The account custodian charges for each transaction as if it were placed individually.

Allocation of Thinly Traded Securities

trueNorth may allocate securities among accounts when enough of a particular security or securities cannot be purchased or sold on a given day at a desired price. In this event, we will allocate the shares actually purchased or sold on pro rata basis. We may remove small allocations from the process if we believe it would not be in the best interest of our client(s).

Trade Errors Policy

From time to time we may make an error in submitting a trade order on your behalf. When this occurs, we may place a correcting trade with the broker-dealer which has custody of your account. If an investment gain results from the correcting trade, the gain will remain in your account unless the same error involved other client account(s) that should have received the gain, it is not permissible for you to retain the gain, or we confer with you and you decide to forego the gain (e.g., due to tax reasons). If the gain does not remain in your account and Charles Schwab & Co. Inc. ("Schwab") is the custodian, Schwab will donate the amount of any gain \$100 and over to charity. If a loss occurs greater than \$100, trueNorth will pay for the loss. Schwab will maintain the loss or gain (if such gain is not retained in your account) if it is under \$100 to minimize and offset its administrative time and expense. Generally, if related trade errors result in both gains and losses in your account, they may be netted.

Review of Accounts (Item 13)

This section of the brochure describes how often client accounts are reviewed and by whom.

Reviews

trueNorth reviews the securities held in its Wealth Management and Investment Advisory Services accounts on an ongoing basis. The reviews are conducted by Karen O'Brien, CPA, CFP® and Joseph Hebert CFP®. Your accounts are reviewed at least quarterly for proper asset allocation to assure they comply with your investment objectives and mandates as described in your investment policy statement.

Hourly financial planning only clients' investments are reviewed only upon your request.

Investment Policy Statement

It is our goal to prepare an Investment policy statement for each Wealth Advisory and Investment Advisory client. An investment policy statement normally describes the allocation of your portfolio based on your financial objectives and investment needs and investment time horizon. Your investment policy statement is drawn up by our investment advisor representative prior to the implementation of our mutually agreed upon investment plan.

Reports

We have arranged for your independent qualified account custodian to prepare and distribute account statements directly to you. These account statements describe all activity in the clients' accounts including account holdings, transactions, and investment advisory fees deducted from the account.

Wealth Advisory Services includes two meetings a year; a portfolio review meeting and a financial planning meeting. Some clients elect to combine the two meetings into one meeting for their convenience.

Portfolio Review meeting: The investments held in your portfolio are reviewed. Asset allocation and portfolio performance reports are provided. As determined by individual client's needs, other portfolio related reports may also be provided. If any changes to current investment plan are determined during the meeting, your Investment Policy Statement will be updated to reflect the changes agreed upon.

Financial Planning meeting: Based on your current financial information that you provide, long term projections are updated. As determined by individual client's needs, they may also receive a summary of objectives and progress towards meeting those objectives. In addition, any planning areas needing special attention will be examined.

Investment Advisory services include the annual portfolio review meeting described above. Once contacted by trueNorth to schedule these meetings, it is up to each client to accept and attend the meeting.

All clients with managed assets receive a Notice of Invoice with account values and trueNorth's fee calculation on a quarterly basis. They also receive written portfolio performance reports on an annual basis. In addition, trueNorth provides reports, when applicable, to assist with income tax preparation on an annual basis.

We gather the information on these reports from sources we believe to be accurate and reliable, but we cannot guarantee their accuracy.

Client Referrals and Other Compensation (Item 14)

This section of the brochure discloses our arrangements with people who are compensated for referring us business.

We have been fortunate to receive many client referrals over the years. The referrals come from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. trueNorth has not entered into any agreements with third parties to give or receive referrals for compensation.

Custody (Item 15)

This section of the brochure encourages you to check the statements sent to you by your account custodian to ensure the accuracy of the fee calculation.

When you become a Wealth Advisory Services or Investment Advisory client of ours you may authorize us to deduct periodic investment advisory fees directly from one or more of your accounts managed by trueNorth. These deductions from your account are shown on the periodic statements sent by your qualified custodian directly to you. You are encouraged to review these statements carefully and compare the amounts on the custodian statements with any statements we send and the fee schedule outlined in your Agreement.

Investment Discretion (Item 16)

This section of the brochure discloses the power we have to make trades in your account.

If you hire us to perform Wealth Management or Investment Advisory Services (ongoing portfolio management), you grant trueNorth a limited power of attorney to select, purchase, or sell securities without obtaining your specific consent within the account(s) you have under our management. The limited powers of attorney are granted in the written Wealth Advisory Services Agreement and Investment Advisory Agreement entered into between us. There are no restrictions upon the securities that may be purchased, sold, or held in your account unless you provide these restrictions to us in writing.

Voting Client Securities (Item 17)

This section of the brochure explains our proxy voting policy and your ability to get proxy voting information from us.

trueNorth will not vote proxies for securities held in your investment account. Your account custodian or transfer agent will send proxy statements directly to you. If the investment account is for a pension or other employee benefit plan governed by ERISA, you direct us not to vote proxies for securities held in the account, because the right to vote such proxies is expressly reserved for you or your plan fiduciary not trueNorth. If you request advice about voting proxies we will provide assistance and advice of any conflict of interest with regard to the proxy.

Financial Information (Item 18)

This section of the brochure is where investment advisors that collect more than \$500 in fees per client and six months or more in advance would include a balance sheet.

trueNorth is not aware of any circumstance that is reasonably likely to impair our ability to meet contractual commitments to you or our other clients. We do not require pre-payment of investment advisory fees of greater than \$500 and more than six months in advance.

Requirements for State-Registered Advisers (Item 19) and Brochure Supplement Part 2B of Form ADV

This section is where state registered advisors disclose any further information required by the state that has not been previously disclosed.

This supplement provides information about Karen O'Brien, Joseph Hebert, and Brooke Trinh listed in Item 4 of this brochure.

Karen O'Brien, CPA, CFP®

CRD Number: 4492812

Educational Background and Business Experience

Karen O'Brien was born in 1954. She attended City University in Seattle where she earned a Bachelor of Science degree in Accounting in 1987. She completed post graduate work in taxation at Golden Gate University, and the College for Financial Planning, CFP® Education Program.

Business Experience

- trueNorth, 2001 to Present, Principal

Karen leads trueNorth's financial planning practice and has been developing financial plans since trueNorth's inception in 2001. She has over twenty-five years of experience in the accounting and financial services industry where she has worked in both public accounting and corporate finance.

Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Karen O'Brien has no legal or disciplinary events related to the financial services industry.

Other Business Activities: Karen O'Brien does not have business activities outside of trueNorth.

Additional Compensation: compensation comes solely from trueNorth and is in part based upon the number of clients and size of accounts that she provides services to. She does not receive compensation from non-clients for providing advisory services.

Professional Designations:

- Certified Public Accountant, State of WA, 1990, Certificate No. 13837
- CERTIFIED FINANCIAL PLANNER™ Certificant, 2004, CFP Board ID No. 089384

Professional Affiliates:

- National Association of Personal Financial Advisors (NAPFA)
- Financial Planning Association (FPA)
- Accounting & Financial Women's Alliance (AFWA)

Joseph Hebert, CFP®

CRD Number: 4548024

Educational Background and Business Experience

Joseph Hebert, CFP® was born in 1961. He attended the University of Washington in Seattle where he earned a Bachelor of Science degree in Electrical Engineering in 1983. He completed post graduate work at the College for Financial Planning, CFP® Education Program.

Business Experience

- trueNorth, 2001 to Present, Principal

Joe leads trueNorth's investment planning practice and has been developing and managing strategic investment plans since 2001. He has over twenty years of management and strategic planning experience between the corporate environment and the personal financial services arena.

Disciplinary Information

Joe Hebert has no legal or disciplinary events related to the financial services industry.

Other Business Activities: Joe Hebert does not have business activities outside of trueNorth.

Additional Compensation: Joe Hebert's compensation comes solely from trueNorth and is in part based upon the number of clients and size of accounts that he provides services to. He does not receive compensation from non-clients for providing advisory services.

Professional Designations:

- CERTIFIED FINANCIAL PLANNER™ Certificant, 2004, CFP Board ID No. 089379

Professional Affiliates:

- National Association of Personal Financial Advisors (NAPFA)
- Financial Planning Association (FPA)

Brooke Trinh, PhD

CRD Number: 6590103

Educational Background and Business Experience

Brooke Trinh was born in 1978. She attended the University of Washington in Seattle where she earned a Bachelor of Science degree in Microbiology in 2002. She completed her doctorate at University of California, Santa Barbara in Molecular Biology/Bacterial Genetics in 2010.

Business Experience

- trueNorth, 2013 to Present, Client Service Manager
- UW Office of Research, 2011-2013, Complex Proposal Manager
- Fred Hutchinson Cancer Research Center, 2010-2011, Postdoctoral Research Fellow
- University of CA Santa Barbara, 2004-2010, Graduate Student Research Assistant

Brooke provides general support in all areas of trueNorth and is typically the initial contact person to prospective clients.

Disciplinary Information

Brooke Trinh has no legal or disciplinary events related to the financial services industry.

Other Business Activities: Brooke Trinh does not have business activities outside of trueNorth.

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP)

Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.

- Successfully pass the Candidate Fitness Standards and background check.
- Within each 24 month period, complete 30 hours of Continuing Professional Education (CPE).

Certified Public Accountant (CPA)

Certified Public Accountants in WA State are licensed by the Board of Accountancy. CPA certification requirements:

- Hold a bachelor's degree from an accredited college or university.
- 24 semester credits in accounting subjects with 15 credits at the upper or graduate level.
- Successful completion of the 14-hour Uniform CPA Examination.
- Minimum of 12 months or 2,000 hours qualifying full-time work experience.
- Complete the AICPA self-study course, Professional Ethics: the AICPA's Comprehensive Course, with a score of 90% or better.
- Within each 36 month period, complete 120 hours of Continuing Professional Education (CPE).

Neither Karen O'Brien nor Joe Hebert receives performance-based fees, been found liable in an arbitration, civil, or self-regulatory investment-related claim, the subject of a bankruptcy petition and do not have any relationship or arrangement with any issuer of securities."

Supervision

trueNorth supervises its investment advisor representatives through a system of internal control procedures overseen by our Chief Compliance Officer, Karen O'Brien. Karen's activities are supervised by Joe Hebert. This oversight includes review of client portfolios, investment advisor representative personal securities transactions, and correspondence.

Information Security Program

Information Security

trueNorth maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

trueNorth Wealth Advisors is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. We will not disclose any information about you unless we have your approval, the law requires it or we have to release information to defend ourselves in a matter of dispute. We do not sell your personal information to anyone; this applies even if you are no longer a client. Our policy with respect to your personal information is listed below.

Personal Information That We Collect, Maintain, and Communicate

We collect personal information so we can provide financial planning and investment management services to you. The types and categories of information we collect and maintain can include:

- Information provided by you on your personal financial profile (such as the data gathering worksheets, documents, and discussions);
- Information we receive from you to open an account or provide investment management services to you (such as date of birth, social security number, address, and telephone number);
- Information about your transactions with us, or others to service your account (such as trade record sheets and account statements);
- Information that we receive from third parties with respect to your account (such as trade confirmations from brokerage firms).

In order for us to provide financial planning and investment management services to you, we may disclose personal information that we collect and maintain in very limited instances, which can include:

- Disclosures that are authorized or requested by you (for example, information such as age or health conditions to receive an insurance quote);
- Disclosures that are required by law (for example to cooperate with regulators or law enforcement authorities);
- Disclosures to companies as otherwise permitted by law, including those necessary to service your account (such as providing account information to custodians).

How We Protect Your Personal Information

To fulfill our privacy commitment, we have established practices to safeguard the information that we maintain about you. These include:

- Maintaining physical, electronic and procedural safeguards to guard your personal information;
- Limiting access to personal information to employees and third parties that are necessary or appropriate to provide services to you;
- Requiring third parties that perform services for us to agree by contract to keep your information strictly confidential.

Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and/or state securities laws.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to you annually, in writing.

Business

Continuity Plan

General

trueNorth has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers a variety of events such as a natural disaster, a co-located server disaster, or a building disaster.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. trueNorth will attempt to notify all clients by telephone within 24-48 hours.

Loss of Key Personnel

trueNorth Wealth Advisors has an Operating Agreement signed by the principal owners to support trueNorth in the event of any owner's serious disability or death.