

**Item 1 – Introduction: Is an investment advisory account right for you?**

True Blue Financial, LLC is registered with the Securities and Exchange Commission as an investment adviser. Please be aware that brokerage and investment advisory services and fees differ, and that it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

**Item 2 – What investment services and advice can you provide me?**

We offer investment advisory services to retail investors. Our principal services include portfolio management, a wrap fee option where we act as both the portfolio manager and sponsor of the program, and the selection of other advisers, where we recommend third-party investment managers/programs (collectively “third parties”) for the management of a portion of your assets based on your specific needs. Regular monitoring and continuous and regular supervisory and/or management services for your managed assets are part of our standard services. These management services are offered on either a *discretionary* or *non-discretionary* basis. *Discretionary* authorization allows us to determine the specific securities and the amount of securities to be purchased or sold for your account without your approval prior to each transaction. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing us with your restrictions and guidelines in writing. *Non-discretionary* arrangements require us to obtain your approval prior to executing any transactions on behalf of your account. We also offer financial planning services, which typically involve providing a variety of advisory services regarding the management of financial resources based on an analysis of individual needs. We do not monitor the investments made as a result of a financial plan unless you have hired us for management services. We do not limit our advice to proprietary products or a limited menu of products or types of investments. In general, we do not require a minimum account size or fee to establish an advisory relationship with us. However, third parties may require minimum account sizes.

For additional information, please refer to Items 4, 7, & 13 of our Form ADV Part 2A and/or Items 4 and 5 of Form ADV Part 2A Appendix 1 Wrap Fee Brochure at the following link: <https://adviserinfo.sec.gov/firm/brochure/310841>.

*Conversation Starters. Ask your financial professional—*

- ❖ *Given my financial 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?*

**Item 3 – What fees will I pay?**

We are primarily compensated by a percentage of assets under our management, hourly fees, or fixed fees. Our fees vary depending on the services you receive and are negotiable depending on factors such as the amount of assets under management, range of investments, and complexity of your financial circumstances, among others. Portfolio management fees are based on a percentage of your assets under our management and are payable each quarter in advance. Asset-based fees associated with our wrap fee program are payable quarterly in advance. The wrap fee will include most transaction costs and fees to a broker-dealer that has custody of these assets. Therefore, wrap fees may be higher than a typical asset-based advisory fee. The more assets there are in your advisory account, the more you will pay in fees. Therefore, we have an incentive to encourage you to increase the assets in your account. Advisory fees charged by third parties are separate and in addition to our advisory fees. Third-party fees are payable in accordance with the third-party agreement and may or may not be negotiable. The compensation arrangement presents a conflict of interest due to a financial incentive to recommend the services of a third-party investment manager/program. Lower fees may be available from firms that do not utilize or recommend third parties. You are not required to use the services of any third party we recommend. Hourly financial fees are negotiable and are payable upon completion of the agreed-upon services.

For additional information regarding our fees, please see Item 5 of our Form ADV Part 2A and/or Item 4 of Form ADV Part 2A Appendix 1 Wrap Fee Brochure at the following link: <https://adviserinfo.sec.gov/firm/brochure/310841>.

**Description of Other Fees and Costs:** The fees that you pay our firm for advisory services are separate and distinct from the fees and expenses charged by investment companies (e.g., mutual funds, exchange traded funds, unit investment trusts, and variable annuities). These fees are described in each fund’s prospectus. These fees will generally include a management fee and other fund expenses. If you are invested in a non-wrap account, you will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian that executes the trade. The broker-dealer or custodian may also charge your account for custodial fees, retirement account fees, trust fees, exchange fees, regulatory fees, redemption fees that may be assessed on investment company shares, transfer fees, account termination fees, or other special service fees and charges. We do not share in any portion of these fees imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by investment companies, broker-dealers, our

firm, third-party money managers, and others. If you participate in our wrap fee program, some fees and expenses will be included in the advisory fee. Some expenses are not included. Please see Item 4 of our [Wrap Fee Brochure](#) for detailed information regarding fees, expenses, and conflicts of interest associated with our wrap fee program.

**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.**

For additional information about fees charged by third parties, please refer to Item 5 of Form ADV Part 2A and/or Item 4 of Form ADV Part 2A Appendix 1 Wrap Fee Brochure at the following link: <https://adviserinfo.sec.gov/firm/brochure/310841>.

*Conversation Starter. Ask your financial professional—*

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

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

**When we act as your investment adviser**, we have to act in your best interest and not put our 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:

- All investment advisers face conflicts of interest that are inherent in the business. Our primary source of compensation is through asset-based fees. Therefore, we are incentivized to acquire new clients and to increase assets under management. Other conflicts of interest result from other business activities we engage in, and from relationships we have with business partners and third parties, or affiliations we have established with other financial institutions.

*Conversation Starter. Ask your financial professional—*

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

Please refer to our Form ADV Part 2A and/or Form ADV Part 2A Appendix 1 for further information on our conflicts of interest and how we address them at the following link: <https://adviserinfo.sec.gov/firm/brochure/310841>.

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

Our financial professionals receive salary-based compensation, a percentage of advisory billings, and/or bonuses based on portfolio performance. Owners of the firm may also receive a profit distribution. Therefore, our financial professionals have an incentive to encourage you to increase the assets in your account. Some of our financial professionals are licensed independent insurance agents and are registered representatives with LPL Financial, LLC (“LPL”), a securities broker-dealer and investment adviser. These financial professionals will offer you brokerage services through LPL or investment advisory services through our firm. Brokerage services and investment advisory services are different, and the fees we and LPL charge for those services are different. It is important that you understand the differences. In particular, financial professionals who are registered through LPL will earn additional compensation, such as transaction-based compensation, and will have additional conflicts of interest as a result of providing brokerage services through LPL. You are encouraged to learn more about LPL by reviewing their website at <https://www.lpl.com/disclosures.html> and having a discussion with your financial professional. You can also access free and simple tools to help you research firms and financial professionals at [Investor.gov/CRS](https://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. These other business activities create conflicts of interest because these financial professionals will receive additional commission-based compensation in connection with the purchase and sale of insurance products and securities, including 12b-1 fees for the sale of certain investment company products. You are not required to purchase insurance products or securities from our financial professionals.

#### Item 4 – Do you or your financial professionals have legal or disciplinary history?

No.

For a free, simple search tool to research us and our financial professionals, please visit [Investor.gov/CRS](https://Investor.gov/CRS).

*Conversation Starter. Ask your financial professional—*

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

#### Item 5 – Additional Information

For additional information about our advisory services, please refer to our Form ADV Part 2A brochure available at <https://adviserinfo.sec.gov/firm/brochure/310841> and the individual Form ADV Part 2B brochure supplement(s) your representative provides. If you have any questions, need up-to-date information, or need a copy of this Client Relationship Summary, please contact us at (269) 982-2710.

*Conversation Starters. Ask your financial professional—*

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