

Item 1: Cover Page

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This brochure provides information about the qualifications and business practices of True Wealth & Company LLC. If you have any questions about the contents of this brochure, please contact us by email to bryan@retirewithtrue.com or calling 913-653-8783. 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.

True Wealth & Company LLC is a registered investment Advisor. Registration of an investment Advisor does not imply any level of skill or training.

Additional information about True Wealth & Company LLC is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. True Wealth & Company LLC's CRD number is 174841.

Item 2: Summary of Material Changes

There have been no material changes since the March 5, 2020 Form ADV filing on the IARD system.

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Item 4 - Advisory Business

True Wealth & Company LLC formerly known as True Alpha Solutions, LLC (“Advisor” or “True Wealth”) registered as an investment advisor in 2015 and provides financial planning and asset management services. The Advisor is owned by Bryan Sarff. Mr. Sarff has been active in the industry since 2003. The Advisor offers consulting services and personalized investment management services to individuals, retirement and profit-sharing plans, trusts, estates, charitable organizations, and corporations. The Advisor is a fiduciary and is required to act in a client’s best interest at all times.

An evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement, risk analysis or similar document. Periodic reviews are also communicated 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.

Other professionals (e.g., lawyers, accountants, tax preparers, insurance agents, etc.) are engaged directly by the client on an as-needed basis and may charge fees of their own. For example, tax preparation and to the extent your estate plan needs to be updated, the tax preparer and/or attorney will bill the client separately. Conflicts of interest will be disclosed to the client in the event they should occur.

ASSET MANAGEMENT

True Wealth offers discretionary direct asset management services to advisory clients. True Wealth will offer clients ongoing portfolio management services through determining individual investment goals, time horizon, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The client will authorize True Wealth discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

ERISA PLAN SERVICES

True Wealth provides service to qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit sharing plans, cash balance plans, and deferred compensation plans. True Wealth may act as a 3(38) advisor:

ERISA 3(38) Investment Manager. True Wealth can also act as an ERISA 3(38) Investment Manager in which it has discretionary management and control of a given retirement plan’s assets. True Wealth would then become solely responsible and liable for the selection, monitoring and replacement of the plan’s investment options.

- Fiduciary Services are:
 - True Wealth has discretionary authority and will make the final decision regarding the initial selection, retention, removal and addition of investment options in accordance with the Plan’s investment policies and objectives.
 - Assist the Client with the selection of a broad range of investment options consistent with ERISA Section 404(c) and the regulations thereunder.
 - Assist the Client in the development of an investment policy statement (“IPS”). The IPS establishes the investment policies and objectives for the Plan.
 - Provide discretionary investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5).

Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Client understands the True Wealth’s assistance in education of the Plan participants shall be consistent with and within the scope of the Department of

Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, the True Wealth is not providing fiduciary advice as defined by ERISA to the Plan participants. True Wealth will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.

- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

True Wealth may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between True Wealth and Client.

- True Wealth has no responsibility to provide services related to the following types of assets ("Excluded Assets"):
 - Employer securities;
 - Real estate (except for real estate funds or publicly traded REITs);
 - Stock brokerage accounts or mutual fund windows;
 - Participant loans;
 - Non-publicly traded partnership interests;
 - Other non-publicly traded securities or property (other than collective trusts and similar vehicles);or
 - Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to the Advisor on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

QUALIFIED PLAN CONSULTING SERVICES

True Wealth offers qualified plan consulting services to individuals for a fee based on included assets in their plan described in detail under "Fees and Compensation" section of this brochure. True Wealth will meet with the client for information gathering. True Wealth will meet with the client at least annually or on an as needed basis determined by the client to review the investment options available within the plan. True Wealth will make investment recommendations to the client based on the investment options available and the client's financial objectives in a meeting with the client.

FINANCIAL PLANNING

True Wealth offers comprehensive planning services to all clients. If financial planning services are applicable, the client will compensate True Wealth on a negotiable fixed fee basis described in detail under "Fees and Compensation" section of this brochure. Services include but are not limited to a thorough review of all applicable topics:

- Reviewing and prioritizing your goals and objectives.
- Developing a summary of your current financial situation, including a net worth statement, cash flow summary, and insurance analysis.
- Reviewing your current investment portfolio and developing an asset management strategy.
- Developing a financial management strategy, including financial projections and analysis.
- Completing a retirement planning assessment, including financial projections of assets required at estimated retirement date.
- Assessing estate net worth and liquidity.
- Identifying tax planning strategies to optimize financial position.
- Presenting a written financial plan that will be reviewed in detail with you. It will contain recommendations designed to meet your stated goals and objectives, supported by relevant financial summaries.
- Developing an action plan to implement the agreed upon recommendations.

- Referral to other professionals, as required, to assist with implementation of the action plan.
- Assisting you with the implementation of the financial plan.
- Determining necessity to revise your financial plan.

The maximum number of hours it could take to provide each service listed above is 2 hours per service needed for the client.

If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through True Wealth. The Advisor does not guarantee the results of its recommendations and losses can occur from the recommended investments. Financial plans will be completed and delivered inside of thirty (30) days. Clients may terminate advisory services with thirty (30) days notice. True Wealth does not provide tax or legal advice; however, True Wealth connects its clients with a CPA, Accountant or Attorney for legal or accounting matters.

BUSINESS CONSULTING

We provide business consulting services to small business owners which includes wealth planning through us and Professional Employer Organizations (“PEO”) through an affiliate, myTrueHR, LLC. We also coordinate with other professionals for Accounting, Tax Planning, and Legal Services.

SEMINARS AND WORKSHOPS

True Wealth holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given. True Wealth does not charge a fee for attendance of these seminars.

CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objectives of each client. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without client consent.

GENERAL INFORMATION

The Advisor shall never have physical custody of any client funds or securities, as the services of a qualified and independent Custodian will be utilized for these asset management services. The Advisor does not offer or participate in a wrap fee program. As of December 31, 2020, we manage \$93,300,000 of assets under management on a discretionary basis and \$4,600,000 on a non-discretionary basis for a total of \$97,900,000 of assets under management.

Item 5 - Fees and Compensation

ASSET MANAGEMENT

Fees for these services will be based on a percentage of Assets Under Management as follows:

Progressive Fee Structure

Assets Under Management		Annual Fee	Monthly Fee
First	\$0 - \$5,000,000	1.20%	.1000%
Next	\$5,000,001 - \$10,000,000	1.00%	.0833%
Next	\$10,000,001 - Over	0.75%	.0625%

*The fee schedule is a tiered fee schedule whereas when the portfolio value reaches the next threshold, the assets above the threshold are charged the lower percentage. When you use tiered rates, the portfolio management fee is calculated by applying different rates to different portions of the portfolio. True Wealth may group certain related client accounts for the purposes of determining the annualized fee. We usually does not require a minimum account size before accepting accounts for

its various management services. However, the Advisor does have a minimum monthly fee for our services of \$400/month, that is negotiable.

This fee is negotiable. Accounts within the same household may be combined for a reduced fee. Fees are billed monthly in arrears based on the amount of assets managed as of the close of business on the last business day of each month. Monthly advisory fees deducted from the clients' account by the custodian will be reflected in the monthly statement from the custodian in the section "Transaction Detail" and will appear similar to "Monthly Mgmt Fee". Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement for a full refund. Clients may terminate advisory services with thirty (30) days notice. True Wealth will be entitled to a pro rata fee for the days service was provided in the final month. Client shall be given thirty (30) days prior written notice of any increase in fees.

ERISA PLAN SERVICES

The annual fees are based on the market value of the Included Assets and will not exceed 1%. The annual fee is negotiable and may be charged as a percentage of the Included Assets or as a flat fee. Fees may be charged quarterly or monthly in arrears or in advance based on the assets as calculated by the custodian or record keeper of the included assets. If the services to be provided start any time other than the first day of a quarter or month, the fee will be prorated based on the number of days remaining in the quarter or month. If this Agreement is terminated prior to the end of the billing cycle, True Wealth shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the billing cycle.

The fee schedule, which includes compensation of True Wealth for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees, however the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. True Wealth does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, True Wealth will disclose this compensation, the services rendered, and the payer of compensation. True Wealth will offset the compensation against the fees agreed upon under the Agreement.

QUALIFIED PLAN CONSULTING SERVICES

True Wealth offers qualified plan consulting services to individuals for a negotiable fee of 1% of included assets. Fees are billed quarterly in arrears based on the amount of assets managed as of the last business day of the previous quarter. Client will be provided an invoice at the commencement of services payable directly to True Wealth within fifteen (15) days of receipt. Alternatively, the client may request the fees be withdrawn from an account held at True Wealth. Clients may terminate their account within five (5) business days for a full refund. For termination after five (5) business days, True Wealth shall be entitled to a prorated fee based on the number of days during the final quarter that services were provided. Clients shall be given thirty (30) days prior written notice of any increase in fees, and Clients will acknowledge, in writing, any agreement of increase in said fees.

FINANCIAL PLANNING

True Wealth charges a negotiable flat fee of \$500 to \$5,000 for financial planning services based on the requested services and billed at \$150 per hour. Client will pay half of the estimated fee at the signing of the agreement with the balance due upon delivery of the completed plan/services. Once all required documentation and information has been provided by the client, services are completed and delivered inside of thirty (30) days. Client may cancel within five (5) business days of signing Agreement for a full refund. If the client cancels after five (5) business days, any unearned fees will be refunded to the client, or any unpaid earned fees will be due to True Wealth. For clients who have asset management services with us, planning is included at no additional charge.

BUSINESS CONSULTING

The monthly wealth planning services are a fee of \$500 per hour and typically range from 3-6 hours depending on the complexity of the services. The myTrueHR PEO services are a monthly cost of \$125 per employee. Accounting and Tax Planning services are available and so are the Legal Services through our connections with third party vendors. All of these third party vendors' services are negotiable depending on the client circumstances.

SEMINARS AND WORKSHOPS

True Wealth holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment advice is given. True Wealth does not charge a fee for attendance of these seminars.

Client Payment of Fees

Investment management fees are billed monthly in arrears and qualified plan consulting fees are billed quarterly, in arrears, meaning that we bill you at the end of the billing period. Payment in full is expected when an invoice is presented. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account. Fees for financial plans are billed 50% in advance with the balance due upon plan delivery. No more than \$500 is billed more than six months in advance.

Additional Client Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities, and exchange-traded funds. These charges may include Mutual Fund transactions fees, postage and handling and miscellaneous fees (fee levied to recover costs associated with fees assessed by self-regulatory organizations). Prospective clients should be aware that in addition to the advisory fees, each mutual fund in which a client's assets are invested also pays its own advisory fees and other internal expenses which already have been deducted from the fund's reported performance. Depending on the fund, a client may be able to invest directly in the shares issued by the fund with or without incurring any sales or third-party management fees. Account maintenance fees are also deducted by the Custodian.

In addition, there are tax effects pertaining to fund share redemptions, and other sales, made by the Advisor on behalf of clients. Redemptions and sales are taxable events which may accelerate the recognition of capital gains, and losses, and frequent redemptions and sales may result in short-term, rather than long-term, capital gains and losses.

Clients should also be aware of the fact that different clients are charged different negotiated fees, thus some clients pay more or less than others for similar services. True Wealth, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Any Advisor created trade errors that result in a net debit to client accounts will be debited against Advisor's Error Account and the client made whole. Any Advisor created trade errors that result in a net credit will be donated to a charity of TD Ameritrade's choice. For more details on the brokerage practices, see Item 12 of this brochure.

External Compensation for the Sale of Securities to Clients

True Wealth does not receive any external compensation for the sale of securities to clients. Investment Advisor Representatives of True Wealth receive external compensation sales of investment related products such as insurance as licensed insurance agents. From time to time, they will offer clients services from those activities.

This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to place the best interest of the Client first and Clients are not required to purchase any products or services. Clients have the option to purchase these products through another insurance agent of their choosing.

Item 6 - Performance Based Fees and Side-by-Side Management

The Advisor does not charge any performance-based fees, which means that fees are not based on a share of the capital gains or appreciation of managed securities. True Wealth does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for the Advisor to recommend an investment that may carry a higher degree of risk to the client.

Item 7 - Types of Clients/Minimum Account Size

The Advisor makes its' advisory services available to a wide variety of clients including, but not limited to, individuals, high net worth individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

The Advisor usually does not require a minimum account size before accepting accounts for its various management services. However, the Advisor does have a minimum monthly fee for our services of \$400/month, that is negotiable. In addition, we do require a negotiated down payment prior to beginning Financial Planning services which does not exceed \$500, six months in advance.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include technical analysis, relative strength, and quantitative momentum. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns.

Technical analysis is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysis does not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Relative strength calculates which investments are the strongest performers, compared to the overall market, and recommends those investments for purchase. Quantitative momentum is an observed tendency for rising asset prices to rise further and falling asset prices to keep falling. Quantitative momentum is a system of buying stocks or securities that have had high returns over the past 3-12 months and selling those that have had poor returns in the same period.

When creating a financial plan, True Wealth utilizes fundamental analysis to provide review of insurance policies for economic value and income replacement. Technical analysis is used to review mutual funds, ETFs (exchange traded funds), Leveraged ETFs (leveraged exchange traded funds), and individual stocks. In providing a financial plan, True Wealth will review client documents such as tax returns and insurance policies.

In developing a financial plan for a client, True Wealth's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the client's specific situation.

The main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategy

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement or Risk Tolerance that documents their objectives and their desired investment strategy. Other strategies may include long-term purchases (positions held for longer than 1 year), short-term purchases (positions sold within a year), trading (securities sold within 30 days), short sales, margin transactions and option writing (including covered options, uncovered options or spreading strategies).

True Wealth generally invests client's cash balances in money market funds, FDIC Insured Certificates of Deposit, high-grade commercial paper and/or government backed debt instruments. Ultimately, True Wealth tries to achieve the highest return on our client's cash balances through relatively low-risk conservative investments. In most cases, at least a partial cash balance will be maintained in a money market account so that True Wealth may debit advisory fees for its services related to comprehensive portfolio management, asset management service and portfolio monitoring, as applicable.

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with True Wealth:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than 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.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

- *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.
- *Leveraged or Excessive Borrowing Risk:* Leveraged exchanged traded products/funds obtain investment exposure in excess of its assets through use of derivatives and seek to achieve investment returns by a multiple in relation to a targeted Index. While gains in Leveraged ETFs may multiply, the losses may also multiply. When holding Leveraged ETFs for periods longer than one day, compounding risks factor into the performance of the Leveraged ETF and may compound either the gains or the losses.

This is not an all-inclusive list of risks. Each client should review the mutual fund prospectus for the specific risks related to each fund that is held in the client's account.

Item 9 - Disciplinary Information

The Advisor does not have any disciplinary information, criminal or civil actions, or administrative or self-regulatory organization enforcement proceedings, to report regarding itself or any of its advisors or other related persons.

Item 10 - Other Financial Industry Activities and Affiliations

The Advisor is not involved in any other financial industry activities nor does it have any financial industry affiliations that are material to its advisory business.

Bryan Sarff is also an independent insurance agent with True Wealth & Company LLC. He spends approximately 5% of his time in his insurance business. He may offer clients of True Wealth advice or products from these activities. As an insurance agent, he may receive separate yet typical compensation in the form of commissions for the sale of products.

Mr. Sarff is also a business consultant and co-owner with a third party of myTrueHR, LLC. He spends approximately 10% of his time as a business consultant on these activities. He may offer clients of True Wealth advice or services from myTrueHR, LLC. He may receive separate yet typical compensation for the services he provides.

These practices represent conflicts of interest because it gives Mr. Sarff an incentive to recommend products and services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the clients first and clients are not required to purchase any products or services. Clients have the option to purchase these products and services through another insurance agent or business advisor of their choosing. True Wealth notifies clients at the time of purchase of any conflicts of interest regarding recommendations that are made.

True Wealth does not utilize the services of Third Party Money Managers to manage client accounts.

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

The Advisor and its employees may buy and sell securities that they recommend to advisory clients for purchase and sale. To the extent possible, the firm and its employees will process securities transactions for client accounts ahead of similar transactions contemplated for their own accounts. To ensure employee transactions are supervised, we have established a Code of Ethics designed to prevent conflicts of interest. Under the requirements of the Code, each Advisor employee is required to file personal transaction reports regularly for transactions in accounts in which they have a beneficial interest. In addition, certain types of transactions for employee personal accounts require preapproval and certain

types of transactions are prohibited. A complete copy of the Advisor's Code of Ethics is available upon request.

Item 12 - Brokerage Practices

The Advisor participates in the institutional customer program offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. The Advisor receives some benefits from TD Ameritrade through its participation in the program.

When placing orders for more than one client account, the Advisor portfolio manager may decide to aggregate similar purchase or sale orders in the same security for several accounts resulting in an average price being applied to each client account participating in the aggregate order.

The Advisor representatives will not generally exercise discretion to evaluate the commissions and services of other broker-dealers unless unusual conditions exist. Selection of one broker-dealer for executing orders may not allow the Advisor to receive research from other broker-dealers in return for commission business, to batch transaction orders with those of other clients for volume commission discounts (unless batched with orders of other the Advisor clients) or allow the Advisor to evaluate the quality of execution services and commissions of other broker-dealers. Thus, selecting a single broker-dealer may not result in best price or execution of a client's transactions.

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

Item 13 - Review of Accounts and Reports

Account reviews are performed at least quarterly and we meet with the client at least annually or on an as needed basis determined by the client, by the Investment Advisor Representative or Portfolio Manager. Account reviews are performed more or less frequently when market conditions dictate. Other conditions that may trigger a review of clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

Client receives confirmations of each transaction in an Account from Custodian on a quarterly basis and not at the time of each trade. However, each trade is usually available in real-time by logging into the web portal provided by Custodian. Account statements are issued by True Wealth's custodian no less than quarterly for managed accounts. Clients are encouraged to sign up for paperless notification services on their investment accounts for more timely communication regarding both transactions and/or charges on their account(s).

Clients will also receive quarterly performance reports via an email link that is prepared for True Wealth by the independent third party firm Advent Black Diamond. Advent Black Diamond was hired by True Wealth, to provide an independent evaluation of our performance. Black Diamond receives a direct data feed from TD Ameritrade and compiles all data reported to the client through their online reporting portal available as a complimentary service to all clients. In addition, we use Morningstar By All Accounts to obtain daily balances of all assets not held at TD Ameritrade. This data is consolidated into the reporting at Advent Black Diamond to provide a consolidated view of all assets we manage for each client family.

Item 14 - Client Referrals and Other Compensation

The Advisor does not currently have any client referral relationships. Thus, it does not pay any fee to a third party for making client referrals to it.

As disclosed under Item 12 above, True Wealth participates in TD Ameritrade's Institutional advisor program and True Wealth may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between True Wealth's participation in the program and the investment advice it gives to its Clients, although True Wealth receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving True Wealth participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to True Wealth by third party vendors.

TD Ameritrade may also have paid for business consulting and professional services received by True Wealth's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit True Wealth but may not benefit its Client accounts. These products or services may assist True Wealth in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help True Wealth manage and further develop its business enterprise. The benefits received by True Wealth or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, True Wealth endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by True Wealth or its related persons in and of itself creates a conflict of interest and may indirectly influence

the True Wealth's choice of TD Ameritrade for custody and brokerage services.

True Wealth may receive succession planning, practice valuation, and equity management services from third-party vendors through True Wealth's participation in the TD Ameritrade Institutional Equity Management Program. In addition to meeting the minimum eligibility criteria for participation in the TD Ameritrade Institutional Equity Management Program, True Wealth may have been selected to participate in the TD Ameritrade Institutional Equity Management Program based on the amount and potential profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with True Wealth and there is no employee or agency relationship between TD Ameritrade and True Wealth. TD Ameritrade has established the TD Ameritrade Institutional Equity Management Program as a means of assisting independent unaffiliated Advisors to grow and maintain their respective investment advisory business. TD Ameritrade does not supervise True Wealth and has no responsibility for True Wealth's management of client portfolios or True Wealth's other advice or services to clients.

True Wealth's participation in the TD Ameritrade Institutional Equity Management Program raises potential conflicts of interest. True Wealth may encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to participate in the TD Ameritrade Institutional Equity Management Program, True Wealth may have an incentive to recommend to clients that the assets under management by True Wealth be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. True Wealth's participation in the TD Ameritrade Institutional Equity Management Program does not relieve True Wealth of the duty to seek best execution of trades for client accounts.

Item 15 – Custody

The Advisor does not take physical custody of client funds or securities. Clients will receive account statements from the custodian and should carefully review those statements. With client permission, we direct deduct fees from client accounts. Our clients may have standing letters of authorization on their accounts. We have reviewed those relationships and determined that they meet the IAA no action letter seven conditions and do not trigger the surprise custody audit.

For a limited number of Client's employer sponsored 401k Accounts, Clients have granted True Wealth the ability to review those accounts at the Custodian for the purpose of assisting with security selection. We do not handle deposits, withdrawals or deduction of fees from those accounts. Our sole responsibility is to review and select the securities and to place trades based on the Client's risk objective. Because True Wealth has client account passwords, we are required to have a surprise custody audit by an independent accountant. Also, clients may have standing letters of authorization on their accounts. True Wealth has reviewed those relationships and determined that they meet the IAA no action letter seven conditions and do not trigger the surprise custody audit. If any standing letters of authorization do not meet the no action letter requirements, those accounts will be included in the surprise custody audit.

Item 16 - Investment Discretion

True Wealth accepts discretionary authority to manage securities accounts on behalf of clients. True Wealth has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client approves the custodian to be used and the commission rates paid to the custodian. True Wealth does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

Item 17 - Voting Client Securities

True Wealth does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent. Clients may call, write or email us to discuss questions they may have about particular proxy vote or other solicitation.

When assistance on voting proxies is requested, True Wealth will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

Item 18 - Financial Information

The Advisor does not receive fees of more than \$500 six months or more in advance. As an advisory firm that maintains discretionary authority for client accounts and is deemed to have custody, we are also required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations. The Advisor has no additional financial circumstances to report.

Item 19 Requirements for State-Registered Advisers

Part A. Principal Executive Officer of the Firm

See Part 2b.

Part B. Business Activities Outside of Providing Investment Advice

See Part 2b, Item 4, and Item 10 regarding other business activities other than providing investment advice.

Part C. Performance Based Fees

See Item 6.

Part D. Material Event Disclosure

During the last ten-year period, Advisor and its management have not been involved in an arbitration claim or a civil, self-regulatory, or administrative proceeding.

Part E. Relationships or Arrangements with Securities Issuers

Advisor and its management have no relationships or arrangements with securities issuers.

Kansas Specific Requirement

Professional Liability Insurance

True Wealth does currently carry professional liability insurance coverage for its investment advisory services.

Confidentiality

Protecting client privacy is very important to the Advisor. The Advisor views protecting its clients' private information as a top priority. Pursuant to the requirements of the Gramm-Leach-Bliley Act, the Advisor has instituted policies and procedures to ensure that customer information is kept private and secure. The Advisor does not disclose any non-public personal information about its clients or former clients to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client account, the Advisor may share some information with its service providers, such as, but not limited to, transfer agents, custodians, broker/dealers, accountants, and lawyers.

The Advisor restricts internal access to non-public personal information about its clients to those employees who need to know that information in order to provide products or services to the client. The Advisor maintains physical and procedural safeguards that comply with federal standards to guard a client's non-public personal information and ensure its integrity and confidentiality. As emphasized above, it has always been and will always be the Advisor's policy never to sell information about current or former customers or their accounts to anyone. It is also the Advisor's policy not to share information unless required to process a transaction, at the request of the Advisor customer, or as required by law.

A copy of the Advisor's privacy policy notice will be provided to each client prior to, or contemporaneously with, the execution of the advisory agreement. Thereafter, the Advisor will deliver a copy of the current privacy policy notice to its clients prior to changing its sharing practices.

SCHEDULE 2B - BROCHURE SUPPLEMENT

Bryan Allen Sarff, CFP®
True Wealth & Company LLC
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Fax: 913-333-3909

www.retirewithtrue.com

CRD Number: 4718059

March 1, 2021

This brochure supplement provides information about Bryan A. Sarff that supplements the True Wealth & Company LLC brochure. You should have received a copy of that brochure. Please contact Bryan Sarff, Chief Compliance Officer, by email to bryan@retirewithtrue.com or calling 913-653-8783 if you did not receive True Wealth & Company LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Bryan A. Sarff also is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 Educational Background and Business Experience

Bryan A. Sarff, CFP®

Year of Birth: 1970

Formal Education after High School:

- University of Missouri, Bachelor of Science - Marketing, 05/1994
- University of Missouri-Kansas City, Financial Planning Certification Program, 11/2008
- The College of Financial Planning, Certified Financial Planner® (CFP®) designation, 04/2010

He has passed securities licenses Series 7 (11/2003), Series 63 (11/2003), Series 66 (11/2004), and SIE (01/2016).

Business Background for the Previous Five Years:

- True Wealth & Company LLC (Formerly known as True Alpha Solutions, LLC); Insurance Agent; 01/2017-Present
- True Wealth & Company LLC (Formerly known as True Alpha Solutions LLC); Investment Adviser Representative; 03/2015 – Present
- True Wealth & Company LLC (Formerly known as True Alpha Solutions LLC); Managing Member; 01/2015 – Present
- myTrueHR, LLC; Business Consultant and co-owner; 10/2020 - Present
- TrueInsurance.Life; Owner/Insurance Agent; KS Insurance License number – 7941581; 11/2014 - 12/2016

Mr. Sarff earned the Certified Financial Planner (CFP) designation in 04/2010. In order to achieve and maintain certification, CFP professionals must: 1) pass the comprehensive CFP Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

ITEM 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

ITEM 4 Other Business Activities

Bryan Sarff is an independent insurance agent with True Wealth & Company LLC. He spends approximately 5% of his time in his insurance. He may offer clients of True Wealth & Company LLC advice or products from these activities.

Mr. Sarff is also a business advisor with myTrueHR, LLC. He spends approximately 10% of his time as a business consultant on these activities. He may offer clients of True Wealth advice or services from myTrueHR, LLC. He may receive separate yet typical compensation for the services he provides.

These practices represent conflicts of interest because it gives Mr. Sarff an incentive to recommend products and services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the clients first and clients are not required to purchase any products or services. Clients have the option to purchase these products and services through another insurance agent or business advisor/fractional CFO of their choosing.

ITEM 5 Additional Compensation

Mr. Sarff receives commission from the sale of insurance and investment products and compensation

from his work as a business advisor and fractional CFO, but he does not receive performance based fees.

ITEM 6 Supervision

Bryan A. Sarff, Chief Compliance Officer, is responsible for monitoring the activities of the Advisor's supervised persons. Mr. Sarff's telephone number is 913-653-8783. Mr. Sarff conducts client contact and continuously reviews investment strategies and market conditions. The Advisor has an Investment Adviser Supervisory Manual and Code of Ethics that are annually reviewed.

ITEM 7 Requirements for State-Registered Advisers

The Advisor, Bryan A. Sarff, and its management have never been involved in an arbitration claim, or a civil, self-regulatory, or administrative proceeding, or a bankruptcy petition.

SCHEDULE 2B - BROCHURE SUPPLEMENT

**Kenneth Eugene Burkhead III
True Wealth & Company LLC
7450 W 130th Street, Suite 300
Overland Park, Kansas 66213
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CRD Number: 6426699

March 1, 2021

This brochure supplement provides information about Kenneth E. Burkhead III that supplements the True Wealth & Company LLC brochure. You should have received a copy of that brochure. Please contact Bryan Sarff, Chief Compliance Officer, by email to bryan@retirewithtrue.com or calling 913-653-8783 if you did not receive True Wealth & Company LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Kenneth E. Burkhead III also is available on the SEC's website at www.Adviserinfo.sec.gov.

ITEM 2 Educational Background and Business Experience

Kenneth E. Burkhead III

Year of Birth: 1987

Formal Education after High School:

- Emporia State University, Bachelor of Finance, 2010

He has passed securities licenses Series 7 (05/2015), Series 66 (01/2015), and SIE (11/2015).

Business Background for the Previous Five Years:

- True Wealth & Company LLC (Formerly known as True Alpha Solutions, LLC); Insurance Agent; 02/2017-Present
- True Wealth & Company LLC (Formerly known as True Alpha Solutions LLC); Investment Adviser Representative; 06/2015 – Present
- myTrueHR, LLC; Business Consultant and co-owner; 10/2020 - Present

ITEM 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

ITEM 4 Other Business Activities

Kenneth Burkhead III is an independent insurance agent with True Wealth & Company LLC. He spends approximately 5% of his time in his insurance. He may offer clients of True Wealth & Company LLC advice or products from these activities.

Mr. Burkhead is also a business advisor with myTrueHR, LLC. He spends approximately 10% of his time on these activities. He may offer clients of True Wealth advice or services from myTrueHR, LLC. He may receive separate yet typical compensation for the services he provides.

These practices represent conflicts of interest because it gives Mr. Burkhead an incentive to recommend products and services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the clients first and clients are not required to purchase any products or services. Clients have the option to purchase these products and services through another insurance agent or business advisor/fractional CFO of their choosing.

ITEM 5 Additional Compensation

Mr. Burkhead receives commission from the sale of insurance and investment products and compensation from his work as a business advisor and fractional CFO, but he does not receive performance based fees.

ITEM 6 Supervision

Bryan A. Sarff, Chief Compliance Officer, is responsible for monitoring the activities of the Advisor's supervised persons. Mr. Sarff's telephone number is 913-653-8783. Mr. Burkhead conducts client contact and continuously reviews investment strategies and market conditions. The Advisor has an Investment Advisor Supervisory Manual and Code of Ethics that are annually reviewed.

ITEM 7 Requirements for State-Registered Advisers

The Advisor, Kenneth E. Burkhead III, and its management have never been involved in an arbitration claim, or a civil, self-regulatory, or administrative proceeding, or a bankruptcy petition.

SCHEDULE 2B - BROCHURE SUPPLEMENT

**Brian Thomas Paulsen, CEPA
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CRD Number: 6329272

March 1, 2021

This brochure supplement provides information about Brian T. Paulsen that supplements the True Wealth & Company LLC brochure. You should have received a copy of that brochure. Please contact Bryan Sarff, Chief Compliance Officer, by email to bryan@retirewithtrue.com or calling 913-653-8783 if you did not receive True Wealth & Company LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Brian T. Paulsen also is available on the SEC's website at www.Adviserinfo.sec.gov.

ITEM 2 Educational Background and Business Experience

Brian T. Paulsen, CEPA

Year of Birth: 1972

Formal Education after High School:

- University of Missouri-Columbia, Bachelor of Science/Bachelor of Arts-Management, 1994

He has passed securities licenses Series 7 (06/2014), Series 66 (08/2014), and SIE (11/2015).

Business Background for the Previous Five Years:

- True Wealth & Company LLC (Formerly known as True Alpha Solutions, LLC); Insurance Agent; 01/2017-Present
- True Wealth & Company LLC (Formerly known as True Alpha Solutions LLC); Investment Adviser Representative; 06/2015 – Present

The Certified Exit Planning Advisor (CEPA) Program is a five-day executive MBA-style program that trains and certifies qualified professional advisors in the field of exit planning. Developed and taught by a diverse team of over 15 nationally-recognized experts, the CEPA program offers attendees an innovative learning experience, performance-enhancing resources, and the strategic insights and tools to help them advance their practice in a transitioning marketplace. Participants who successfully complete the CEPA program and pass the closed book proctored exam receive the Certified Exit Planning Advisor (CEPA) credential and earn up to 34 continuing education credits with twelve major professional associations.

ITEM 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

ITEM 4 Other Business Activities

Brian Paulsen is an independent insurance agent with True Wealth & Company LLC. He spends approximately 10% of his time in his insurance. He may offer clients of True Wealth & Company LLC advice or products from these activities.

ITEM 5 Additional Compensation

Mr. Paulsen receives commission from the sale of insurance and investment products and compensation from his work as a business advisor and fractional CFO, but he does not receive performance based fees.

ITEM 6 Supervision

Bryan A. Sarff, Chief Compliance Officer, is responsible for monitoring the activities of the Advisor's supervised persons. Mr. Sarff's telephone number is 913-653-8783. Mr. Paulsen conducts client contact and continuously reviews investment strategies and market conditions. The Advisor has an Investment Advisor Supervisory Manual and Code of Ethics that are annually reviewed.

ITEM 7 Requirements for State-Registered Advisers

The Advisor, Brian T. Paulsen, and its management have never been involved in an arbitration claim, or a civil, self-regulatory, or administrative proceeding, or a bankruptcy petition.