

# Item 1: Cover Page

## True Square Financial LLC

1040 W Marietta St NW  
Atlanta, GA 30318

### **Form ADV Part 2A – Firm Brochure**

(404) 975-2720

Dated January 24, 2020

This Brochure provides information about the qualifications and business practices of True Square Financial LLC, “TSF”. If you have any questions about the contents of this Brochure, please contact us at (404) 275-2720. 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 Square Financial LLC is registered as an Investment Adviser with the State of Georgia. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about TSF is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the firm’s identification number 287997.

# Item 2: Material Changes

The last annual update of this brochure was filed on January 17, 2019. The following material changes have been made to this version of the Disclosure Brochure:

- Added Personal Tax Preparation Services to Items 4 and 5
- Added Retirement Plan Consulting Services to Items 4 and 5

## Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 287997.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (404) 975-2720.

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## Item 4: Advisory Business

### Description of Advisory Firm

True Square Financial LLC is registered as an Investment Adviser with the State of Georgia. We were founded in February 2017. Daniel Mahoney is the principal owner of TSF. TSF currently reports \$28,447,882 in discretionary and no non-discretionary Assets Under Management.

### Types of Advisory Services

#### Investment Management Services

We are in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to clients regarding the investment of the client's funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation target. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

## Comprehensive Financial Planning

Our comprehensive financial planning service involves working with clients over an extended period of time to develop, implement, and update a financial plan. By paying a monthly/quarterly retainer, clients get continuous access to a planner who will work with them to design their plan, make recommendations, and answer questions.

Comprehensive financial planning is a holistic evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Clients purchasing this service will receive a written or an electronic report, providing the client with recommendations designed to achieve his or her stated financial goals and objectives.

We work with clients to identify and prioritize topic areas to address through the planning process. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with clients to assess their current situation, identify their objectives, and develop a plan aimed at achieving their goals.
- **Cash Flow and Debt Management:** We review clients' income and expenses to determine their current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for clients to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review potential eligibility for financial aid and/or the best way to contribute to grandchildren or other family members.
- **Employee Benefits Optimization:** We assess whether clients are taking the maximum advantage possible of your employee benefits. For business owners, we consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** We evaluate clients' current estate plan, which may include whether wills, powers of attorney, trusts and other related documents, and recommend potential changes to meet the clients' goals and objectives. Our advice also typically includes an assessment of the client's exposure to estate taxes and, for clients potentially exposed to estate tax, recommending actions to reduce or avoid such exposure.

We always recommend that clients consult with a qualified attorney prior to implementing estate planning activities or signing documents.

- **Financial Goals:** We help clients identify financial goals and develop a plan to reach them. In general, this involves identifying what the client plans to accomplish, what resources will be required, how much time is available, and potential alternatives and/or trade-offs.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, and reviewing existing investment holdings, including equity-based compensation plans.
- **Retirement Planning:** Our retirement planning services typically include projections of clients' likelihood of achieving their financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

For clients who have already retired, we may recommend distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of clients' exposure to major risks that could have a significant adverse impact on their financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. As part of this analysis, we may review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile. We may advise the client on ways to minimize risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring"). We do not sell insurance products.
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of clients' overall financial picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their tax efficiency, with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact clients' situation.

We recommend that clients consult with a qualified tax professional before initiating any tax planning strategy, and we may provide clients with contact information for accountants or attorneys who specialize in this area.

### **Limited Financial Planning**

Our limited financial planning services include a review or discussion of one or more of the topics included in our comprehensive financial planning services, except that the limited financial planning services are not provided on an ongoing basis. Clients purchasing the limited financial planning service typically have a single meeting with a planner, after which the engagement ends and no further services are provided.

### **Personal Tax Return Preparation**

We provide tax preparation services for our clients to assist with the filing of federal and state tax returns for individuals and businesses. We may ask for an explanation or clarification of some items, but we will not audit or otherwise verify client data. The client is responsible for the completeness and accuracy of information used to prepare the returns. Our responsibility is to prepare the returns in accordance with applicable tax laws. We will utilize the services of a third-party accounting, bookkeeping, and tax preparation firm to facilitate the preparation and filing of the client's tax returns and we will work with the client and the third party in order to gather the necessary information as part of this service.

We may observe opportunities for tax savings that require planning or changes in the way the client handles some transactions. While an engagement for tax return preparation does not include significant tax planning services, we will share any ideas we have with you and discuss terms for any additional work that may be required to implement those ideas.

### **Retirement Plan Consulting**

We provide retirement plan design and support services for our clients who own businesses and wish to establish or modify employer-sponsored retirement plans. As part of this service, the client will receive the documents required for the client to adopt and operate a qualified retirement plan. We will amend and/or update these documents as required by law. Our retirement plan consulting services do not include recordkeeping, retirement plan administration, or investment advice, though the client may retain us separately to provide Investment Management Services as described above.

### **Client Tailored Services and Client Imposed Restrictions**

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon each client's situation (income, tax levels, and risk tolerance levels) and is used to construct a client-specific plan and/or investment portfolio. Clients may impose restrictions on investing in certain securities or types of securities.

### **Wrap Fee Programs**

We do not participate in wrap fee programs.

# Item 5: Fees and Compensation

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

## **Investment Management Services**

We offer investment management services for a flat monthly fee between \$125 - \$5,000 per month, based on the complexity of the client's situation. The fees are negotiable and are paid in advance on a monthly basis. No increase in the monthly fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

Investment management accounts initiated or terminated during a month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 30 calendar days in advance. Upon termination of the account, any unearned fee will be refunded to the client. Fees for this service may be paid by electronic funds transfer or check or may be withdrawn from the client's account.

Annual investment management fees will not exceed 3% of assets under management.

## **Comprehensive Financial Planning**

We offer comprehensive financial planning services for an upfront charge of \$1,000 - \$5,000 plus an ongoing fee that is paid monthly, in advance, at the rate between \$250 - \$5,000 month, based on the complexity of the client's situation. The fee may be negotiable in certain cases. Fees for this service may be paid by electronic funds transfer or check. This service may be terminated with 30 days' notice. Upon termination of any account, the fee will be prorated and any unearned fee will be refunded to the client.

## **Limited Financial Planning**

We offer Limited Financial Planning services for a one-time fixed fee between \$500 - \$5,000 due at the start of the engagement, based on the complexity of the client's situation.

## **Personal Tax Return Preparation**

We offer Personal Tax Return Preparation for a flat fee of \$500 - \$5,000 per return, based on the complexity of the return and quality of recordkeeping. The fees may be negotiable in certain cases, will be agreed upon at the start of the engagement, and are due at the completion of the engagement. Clients are not required to utilize any third-party products or services that we may recommend and they can receive similar services from other professionals at a similar or lower cost.

## **Retirement Plan Consulting**

We offer Retirement Plan Consulting for an initial fee of \$500 - \$5,000 per plan, plus an annual fee of \$150 - \$1,500 per plan, based on the complexity of the retirement plan and the client's situation. The fees may be

negotiable in certain cases and will be agreed upon at the start of the engagement. The initial fee is due upon delivery of the plan documents and the annual fee is due one year after delivery of the retirement plan documents and each subsequent year until the retirement plan is terminated, including the year of plan termination.

### **Other Types of Fees and Expenses**

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees.

## **Item 7: Types of Clients**

We provide financial planning and portfolio management services to individuals, high net-worth individuals, charitable organizations, retirement plans, and corporations or other businesses.

We do not have a minimum account size requirement.

# Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

When clients have us complete an Investment Analysis (described in Item 4 of this brochure) as part of their financial plan, our primary methods of investment are fundamental analysis and passive investment management.

**Fundamental analysis** involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Passive Investment Management** involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Investments that passively capture the returns of the desired asset classes are placed in the portfolio.

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

## Material Risks Involved

**All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable, or find buyers at any price.

**Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

## Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific asset classes may have other risks.

**Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Options and other derivatives** carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

**Investment Companies Risk.** When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which client's invest.

**Real estate** may go up and down in price based on global, national, or location-specific factors, including job and wage trends, interest rates, regulations, amenities, and available supply of comparable properties. Rents, expenses, and other elements of real estate net income are subject to the same risks that impact real estate prices.

## Item 9: Disciplinary Information

### **Criminal or Civil Actions**

TSF and its management have not been involved in any criminal or civil action.

### **Administrative Enforcement Proceedings**

TSF and its management have not been involved in administrative enforcement proceedings.

### **Self-Regulatory Organization Enforcement Proceedings**

TSF and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of TSF or the integrity of its management.

# Item 10: Other Financial Industry Activities and Affiliations

No TSF employee is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No TSF employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

TSF does not have any related parties. As a result, we do not have a relationship with any related parties.

TSF only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc. and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

## Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.

- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide of copy of its Code of Ethics to any client or prospective client upon request.

## **Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

## **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Our firm and its "related persons" may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

## **Trading Securities At/Around the Same Time as Client's Securities**

From time to time, our firm or its "related persons" may buy or sell securities for themselves at or around the same time as clients. Without proper procedures in place this could create a potential conflict of interest if the adviser or any related person were to trade ahead of a client's account in order to receive more favorable pricing. To reduce or eliminate any potential conflicts of interest with this activity, we will not trade non-mutual fund securities during the 5 days prior to trading the same security for clients.

# Item 12: Brokerage Practices

## **Factors Used to Select Custodians and/or Broker-Dealers**

True Square Financial LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

### **1. Research and Other Soft-Dollar Benefits**

We currently receive soft dollar benefits by nature of our relationship with TD Ameritrade Institutional, Division of TD Ameritrade, Inc., member FINRA/SIPC.

## **2. Brokerage for Client Referrals**

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

## **3. Clients Directing Which Broker/Dealer/Custodian to Use**

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients money over using a lower-cost custodian.

## **The Custodian and Brokers We Use (TD Ameritrade)**

TSF participates in TD Ameritrade's institutional customer program and may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between TSF's participation in the program and the investment advice it gives to its clients, although TSF 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 TSF 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 TSF by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by TSF's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit TSF but may not benefit its client accounts. These products or services may assist TSF in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help TSF manage and further develop its business enterprise. The benefits received by TSF 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, TSF endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by TSF or its related persons in and of itself creates a potential conflict of interest and may indirectly influence TSF's choice of TD Ameritrade for custody and brokerage services.

## **Aggregating (Block) Trading for Multiple Client Accounts**

Generally, we do not combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading").

# **Item 13: Review of Accounts**

Client accounts with the Investment Management Service will be reviewed regularly on a quarterly basis by Daniel Mahoney, President and CCO. The account is reviewed with regards to the client's investment policies

and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

TSF will provide written reports to Investment Management clients on a quarterly basis. We urge clients to compare these reports against the account statements they receive from their custodian.

## Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

We receive a non-economic benefit from TD Ameritrade in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at TD Ameritrade. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of TD Ameritrade's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

## Item 15: Custody

TSF does not accept custody of client funds except in the instance of withdrawing client fees.

For client accounts in which TSF directly debits their advisory fee:

- i. TSF will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
- ii. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.
- iii. The client will provide written authorization to TSF, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## Item 16: Investment Discretion

For those client accounts where we provide investment management services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client.

## Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

## Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

# Item 19: Requirements for State-Registered Advisers

## Daniel Mahoney

Born: 1979

### Educational Background

- 2008 – Master of Business Administration, University of Virginia, Darden School of Business
- 2001 – A.B. in Economics, Dartmouth College

### Business Experience

- 03/2017 – Present, True Square Financial LLC, President and CCO
- 01/2014 – 03/2017, Invesco Ltd., Strategist
- 09/2008 – 01/2014, Bain & Company Inc., Principal

### Professional Designations, Licensing & Exams

**FINRA Series 65:** Uniform Investment Advisor Law Examination

**CFP (Certified Financial Planner)®:** The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real-world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

## **Other Business Activities**

Daniel Mahoney currently performs business consulting services for 5 hours per month. This activity accounts for approximately 2% of his time.

## **Performance Based Fees**

TSF is not compensated by performance-based fees.

## **Material Disciplinary Disclosures**

No management person at True Square Financial LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## **Material Relationships That Management Persons Have With Issuers of Securities**

True Square Financial LLC, nor Daniel Mahoney, have any relationship or arrangement with issuers of securities.

## **Additional Compensation**

Daniel Mahoney does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through TSF.

## **Supervision**

Daniel Mahoney, as President and Chief Compliance Officer of TSF, is responsible for supervision. He/She may be contacted at the phone number on this brochure supplement.

## **Requirements for State Registered Advisers**

Daniel Mahoney has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

# Item 1: Cover Page

## True Square Financial LLC

1040 W Marietta St NW  
Atlanta, GA 30318  
(404) 275-2740

Dated January 17, 2019

### Form ADV Part 2B – Brochure Supplement

*For*

**Daniel Mahoney - Individual CRD# 4236650**

President, and Chief Compliance Officer

This brochure supplement provides information about Daniel Mahoney that supplements the True Square Financial LLC (“TSF”) brochure. A copy of that brochure precedes this supplement. Please contact Daniel Mahoney if the TSF brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Daniel Mahoney is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 4236650.

# Item 2: Educational Background and Business Experience

## Daniel Mahoney

Born: 1979

### Educational Background

- 2008 – Master of Business Administration, University of Virginia, Darden School of Business
- 2001 – A.B. in Economics, Dartmouth College

### Business Experience

- 03/2017 – Present, True Square Financial LLC, President and CCO
- 01/2014 – 03/2017, Invesco Ltd., Strategist
- 09/2008 – 01/2014, Bain & Company Inc., Principal

### Professional Designations, Licensing & Exams

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

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- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

## Item 3: Disciplinary Information

No management person at True Square Financial LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## Item 4: Other Business Activities

Daniel Mahoney currently performs business consulting services for 5 hours per month. This activity accounts for approximately 2% of his time.

## Item 5: Additional Compensation

Daniel Mahoney does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through TSF.

## Item 6: Supervision

Daniel Mahoney, as President and Chief Compliance Officer of TSF, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

## Item 7: Requirements for State Registered Advisers

Daniel Mahoney has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.