

TFO-TDC, LLC (“we” or “us”) is registered with the Securities Exchange Commission (“SEC”) as an investment adviser. Our services and compensation structure differs from that of a registered broker-dealer. Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS. The site also provides educational materials about broker-dealers, investment advisers and investing. Information in text boxes below are intended to be conversation starters for you to have with us and are required by the instructions to Form CRS.

What investment services and advice can you provide me?

We provide various services to our clients. Certain services are not described in this Form CRS, because they are not intended for clients that are natural persons who are seeking services primarily for personal, family, or household purposes. We provide discretionary or nondiscretionary investment management services, family office services, and consulting services. We also provide a digital offering.

We work with you to determine your investment objectives and risk profile and design a written investment policy statement. We evaluate your existing investments with respect to your investment policy statement. If you are a new client, we will work with you to develop a plan to transition your existing portfolio to our desired portfolio. We then continuously monitor your portfolio holdings and its overall asset allocation strategy and hold review meetings as necessary.

We generally provide our services on a discretionary basis, which means we have the authority to decide which securities to buy and sell in your account. You can place reasonable restrictions on the securities that we buy by notifying us, in writing. However, we do also offer clients the option of having us manage their accounts on a non-discretionary basis, which would require your consent before taking action in your account.

We do not limit the scope of the universe of securities that we use in managing client accounts, but we generally use mutual funds, fixed income securities, equities and exchange traded funds (ETFs). We may also recommend one or more independent managers to manage all or a portion of your assets.

We do not have any stated minimum account requirements although we typically negotiate these aspects of the relationship with clients. Our digital offering does have account minimums for opening an account and to access certain features.

For more detailed information about our *Advisory Business* and the *Types of Clients* we generally service, please See Items 4 and 7, respectively in our [Form ADV Part 2A](#).

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

What fees will I pay?

The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services. For more detailed information, please See Items 5 and 6 in our [Form ADV Part 2A](#).

- * **Asset Based Fees** - Payable quarterly in advance. Since the fees we receive are asset-based (i.e., based on the value of your account), we have an incentive to increase your account value which creates a conflict especially for those accounts holding illiquid or hard-to-value assets.
- * **Hourly Fees** - Payable in advance; however, other fee-paying arrangements can be made.
- * **Fixed Fees** - Payable In advance; however, other fee-paying arrangements can be made.
- * **Percentage of Net Worth** - Payable quarterly in advance. This paying arrangement may be offered as appropriate and negotiated on an individualized basis.
- * **Other Advisory Fees** - In addition to our fees, clients will also incur advisory fees charged by third party money managers, which are separate and apart from our fees.

The Firm’s fee is negotiable based on many factors, but under no circumstances will exceed 1.50% of a client’s assets under management.

Additionally, the following are examples of the most common fees and costs applicable to our clients:

- *Custodian fees*
- *Account maintenance fees*
- *Fees related to mutual funds and exchange-traded funds*
- *Transaction charges when purchasing or selling securities and*
- *Other product-level fees associated with your investments*

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

Certain of our supervised persons may provide legal or accounting services and the fees you pay for these services would be negotiated directly with A copy of our Part 2A is available at: https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=793370

them. We may also recommend one of our affiliates or our representatives who are licensed insurance agents, certified public accountants, or attorneys to assist you with insurance, accounting, or legal needs. The fees you pay them are separate from the fees you pay us.

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

For more detailed information about our fees and costs related to our management of your account, please See Item 5 in our [Form ADV Part 2A](#).

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

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

- * We may recommend a particular custodian from whom we receive support services. This presents a conflict of interest, because our receipt of their support makes us more inclined to continue using and recommending them; however, we offer more than one custodian.
- * We and our employees and owners have affiliations with (i) one or more insurance agency and their agents, (ii) a trust company, (iii) an accounting firm, and (iv) a law firm. These relationships present a conflict of interest because our affiliates and their employees stand to receive additional compensation. You are free to use the services of any non-affiliated entity or person.
- * You may have been referred to us by someone that we compensate for referrals.
- * We may recommend rollovers out of employer-sponsored retirement plans and into Individual Retirement Accounts that we manage for an asset-based fee. If we don't currently manage your account held with your employer's plan, this will increase our compensation.

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

For more detailed information about our conflicts of interest, please review Item 4, 11 and 12 of our [Form ADV Part 2A](#).

How do your financial professionals make money?

Our financial professionals are generally compensated on a salary basis and are eligible for bonuses. Compensation is based on the overall individual performance, which includes client relationship skills, technical skills, consistency with the firm's values, teamwork, positive attitude, individual performance objectives, participation in firm-wide initiatives. Certain bonus opportunities are based on the overall profitability of the firm, which is partially based on how our clients' portfolios perform and the amount of assets we manage. The amount of new business generated by a financial professional may be taken into consideration in awarding bonuses. In such cases, the bonus compensation paid to our financial professionals involves a conflict of interest because they have a financial incentive to refer clients to our firm. In addition, certain of our financial professionals are equity owners of the firm, in which case they stand to receive a share of the profits of the firm. Financial professionals may recommend services provided by an affiliated entity and earn separate, yet customary compensation through (i) common ownership, (ii) as a licensed or registered person with an association with the entity, and/or (iii) indirectly through a performance-based compensation structure. This incentivizes our financial professions to recommend services provided by affiliated entities. You should discuss your financial professional's compensation directly with your financial professional.

Do you or your financial professionals have legal or disciplinary history?

No

We encourage you to visit www.investor.gov/CRS to research our firm and our financial professionals.

As a financial professional, do you have any disciplinary history? If so, for what type of conduct?

Additional Information

Additional information about our firm 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. The CRD number for TFO-TDC is 124407. You may contact our Chief Compliance Officer at any time to request a current copy of your Form ADV Part 2A or our *relationship summary*. Our Chief Compliance Officer may be reached by phone at (419) 891-9999.

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

A copy of our Part 2A is available at: https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=793370

EXHIBIT TO THE AMENDED FORM CRS

TFO - TDC, LLC

SUMMARY OF MATERIAL CHANGES

September 7, 2022

The following section of the TFO– TDC, LLC (“TDC”) Form CRS has been amended as follows:

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

- This disclosure has been updated to No.