

## **FORM ADV PART 2A – FIRM BROCHURE**

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**This brochure provides information about the qualifications and business practices of Polaris Financial, LLC. If you have any questions about the contents of this brochure, please contact us at [support@partnerpf.com](mailto:support@partnerpf.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.**

**Additional information about Polaris Financial also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Please search our full firm name or our CRD# 281952.**

Polaris Financial is a registered investment advisor with the SEC. The information in this brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training.

Non-Deposit Investment Products offered through Polaris Financial are not federally insured, are not guaranteed by or obligations of Polaris Financial and may involve investment risk, including possible loss of principal.

## **Item 2 – Summary of Material Changes**

The last update of Polaris Financial LLC Form ADV Part 2A Brochure was on March 31st, 2023. Since the most recent update the following specific material changes have been made:

- Polaris retired its wrap fee program
- Polaris retired its managed cryptocurrency program
- Polaris updated Item 4 - Advisory Services
- Polaris updated Item 5 - Fees and Compensation
- Polaris updated Item 12 - Brokerage Practices
- Polaris updated Item 14 - Client Referrals & Other Compensation
- Polaris updated Item 15 - Custody

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## **Item 4 – Advisory Services**

### **Firm Description**

Polaris Financial (Polaris), a Delaware Limited Liability Company organized in 2016, is an SEC-registered investment advisor that maintains its principal office at 38 Maurice Road Wellesley, Massachusetts 02482. Polaris typically operates under two doing business as names: Credit Union Wealth Group and Banc Wealth Group. The firm is owned by Evan Kulak and Michael McDermott.

### **Types of Advisory Services**

Polaris offers investment management services to clients remotely, primarily over video conferencing, phone, and/or email communications. We offer investment advisory services for two types of clients: retail investors (individual and families) and employer-sponsored retirement plans.

For retail clients, our financial advisors take a goal-oriented approach to advice. We utilize quantitative and qualitative methods to determine a client's goal(s), age, risk tolerance, investment experience, time horizon, net worth, and investment preferences. The gathered information is utilized to recommend an appropriate financial strategy and portfolio. Advisory services we provide may include:

- Investment Strategy
- Asset Allocation
- Risk Tolerance
- Financial Planning
- Life Event Mapping
- Portfolio Rebalancing
- Fund Selection
- Portfolio Monitoring

We typically invest retail client assets into one of our model portfolios. Model portfolios are composed of mutual funds and/or exchange traded funds (ETFs). Our model portfolios can be customized upon client request or at a financial advisor's discretion. Custom portfolios may include a mix of mutual funds, ETFs, and/or separately managed accounts (SMAs). Clients may impose restrictions in investing in certain securities in accordance with their preferences, values or beliefs.

For employer-sponsored retirement plans, we offer the following investment advisory services:

- 3(38) investment advisory services
- Investment Policy Statement construction and monitoring
- Employee retirement seminars
- Fund due diligence, selection, management, and benchmarking
- Qualified Default Investment Alternative (QDIA) Selection

As a 3(38) Investment Manager, we are only responsible for the investments we select and will not have any responsibility or liability regarding other investments offered by the Plan. Plan Sponsors may offer an option for Plan Participants to utilize self-directed brokerage accounts. We will not manage assets held in such brokerage accounts. We will not advise Plan Participants on any aspect of a self-directed brokerage account.

Our 3(38) Investment Management services are provided by serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of our fiduciary status, the specific services to be rendered and all direct and indirect compensation we reasonably expect under the engagement.

#### Wrap Fee Program

Polaris does not offer a wrap fee program.

#### Assets Under Management

As of December 31st, 2023, we managed approximately \$34,376,124 in client assets, all of which are on a discretionary basis.

### **Item 5 – Fees & Compensation**

#### Advisory Fees for Retail Clients

Retail clients pay a 1.5% annual fee billed monthly in arrears pursuant to the terms of the client investment advisory agreement. Investment advisory fees are based on the daily average market value of the account balance. Fees may be negotiable at the sole discretion of Polaris.

#### Advisory Fees for Employer Sponsored Retirement Plans

Plan participants pay a 1% annual fee billed quarterly in arrears pursuant to the terms of the Plan’s investment agreement. Investment advisory fees are based on the market value of assets under management as reported on the last day of the quarter. Fees may be negotiable at the sole discretion of Polaris.

Polaris will deduct our fee directly from the plan participants’ account through the qualified custodian holding the Plan’s funds and securities. Polaris will deduct our advisory fee only when the Plan has given us written authorization permitting the fees to be paid directly from the participants’ account. The qualified custodian will deliver an account statement to the Plan and its participants at least quarterly. These account statements will show all disbursements from plan participant accounts.

Clients should review all statements for accuracy. It is the client’s responsibility to verify the accuracy of these fees as listed on the custodian’s brokerage statement.

Clients may incur third-party fees or expenses in connection with Polaris’ advisory services. All fees paid to Polaris for advisory services are separate and distinct from the expenses charged by mutual funds, ETFs, and SMAs. These fees and expenses are described in each fund’s or strategy’s prospectus. These fees are generally composed of a management fee and other Fund expenses. Polaris does not earn nor receive a portion of such fees.

Polaris utilizes the services of broker-dealers to effect portfolio transactions and clients may incur brokerage, custodial, and other transaction costs. For additional information regarding brokerage practices, please see Item 12 - Brokerage Practices.

Polaris does not charge fees in advance. Neither Polaris nor any of its supervised persons accept compensation for the sale of securities or other investment products.

## **Item 6 – Performance-Based Fees & Side-By-Side Management**

Polaris does not charge performance-based fees for its investment advisory services. None of Polaris supervised persons accept performance-based fees.

## **Item 7 – Types of Client**

Polaris provides investment advisory services to individuals, families, and employer-sponsored retirement plans. We have a \$500 (USD) minimum account size requirement for individuals and families. For employer-sponsored retirement plans we do not have a minimum account size. The minimum account size requirement is negotiable at Polaris' sole discretion.

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

### **Methods of Analysis**

The Polaris Financial Investment Advisory Committee (Committee) is responsible for the design and management of the firm's investment strategies. The Committee employs a combination of Macroeconomic, Tactical, and Fundamental analysis to determine asset allocation, investment management, and select the mutual funds / ETFs for the strategies.

Macroeconomic Analysis refers to the evaluation of broad economic factors and trends that could impact investment decisions and portfolio management strategies. This analysis typically includes an assessment of key macroeconomic indicators such as GDP growth, inflation rates, interest rates, unemployment figures, fiscal and monetary policies, as well as global economic conditions.

Tactical Analysis utilizes a rules-based strategy that shifts the allocation of the portfolio based on quantitative factors and economic indicators. Quantitative factors and indicators include valuation and market momentum criteria.

Fundamental Analysis refers to the method of evaluating securities (such as funds, stocks, or bonds) by examining the intrinsic value of the underlying assets. This analysis involves assessing various qualitative and quantitative factors that can affect the financial performance and future prospects of a company or security.

Mutual Fund & ETF Analysis refers to the process of selecting an investment vehicle for inclusion into an investment strategy. The Committee analyzes funds based on a variety of criteria, such as expense ratio, implied liquidity, asset size, investment methodology, strength & stability of fund sponsor, and tax treatment.

The Committee utilizes the following sources of information for its analysis: information provided by third party data providers, Federal Reserve Economic Data, financial newspapers & magazines, third party research materials, corporate rating services, annual reports, prospectuses, filings with the SEC, and press releases.

## **Investment Strategies**

For retail clients, we currently offer a suite of model portfolios composed of mutual funds and ETFs. The Committee is responsible for the model portfolio's investment strategy and management. Polaris makes available eleven categories of model portfolios: Cash Reserve, Money Market, Laddered Bond, Bond, Buffered, Multi-Asset Income, Core, Biblically Responsible Investing, Precious Metals, Thematic, and Bitcoin. Each category is composed of one or more model portfolios.

### **A. Cash Reserve**

The Cash Reserve is a variable interest rate FDIC insured account. The purpose of the account is to provide a high yield coupled with extra FDIC insurance. The account is offered through a separate account at Altruist Financial LLC, referred to as Altruist Cash. Altruist Financial deposits cash in the Altruist Cash account with one or more banks ("Program Banks" see the Altruist Financial LLC Participating Bank List on [altruist.com/legal](http://altruist.com/legal) for full list) that accept and maintain such deposits. Through Altruist Cash, clients' cash is deposited into Program Banks where the cash earns a variable interest rate and is eligible for FDIC insurance. Cash is not eligible for FDIC insurance until the cash is deposited at the Program Banks. Cash in the Altruist Cash account that is awaiting to be deposited in, and cash in transit to or from, Program Banks, may not be eligible for coverage under SIPC. SIPC coverage does not apply to cash deposited with Program Banks. FDIC insurance is limited to \$250,000 per depositor, per FDIC-insured bank, per ownership category and is subject to conditions. More information can be found in the Altruist Cash Disclosure Statement and the Altruist Financial LLC Participating Bank List, both available on [altruist.com/legal](http://altruist.com/legal). FDIC coverage can be impacted by several things, including but not limited to deposit capacity at a Program Bank and/or if a client holds cash at a Program Bank, including through this or additional sweep programs. Clients are responsible for monitoring their total assets at each of the Program Banks, whether through Altruist Financial accounts or accounts with other financial intermediaries, to determine the extent of available FDIC insurance coverage in accordance with FDIC rules. For more information on FDIC insurance coverage, please visit [FDIC.gov](http://FDIC.gov).

### **B. Money Market Portfolios**

The Money Market Portfolios category is composed of four distinct money market mutual funds each representing a respective money market category: Treasury, Government, Municipal, or Prime. Portfolios seek to provide capital preservation, current income, and liquidity within its respective money market classification.

### **C. Laddered Bond Portfolios**

The Laddered Bond Portfolios category is composed of a suite of laddered fixed term bond ETF portfolios. The category is composed of four distinct asset class bond ladders: U.S. Treasuries, U.S. Treasury Inflation Protected Securities (TIPS), Municipals, and Corporates. For each asset class category, there is a 1-3 year and 1-5 year ladder portfolio option. A list of the portfolios offered is as follows: Treasury Ladder 1-3 Year, Treasury Ladder 1-5 Year, TIPS Ladder 1-3 Year, TIPS Ladder 1-5 Year, Municipal Ladder 1-3 Year, Municipal

Ladder 1-5 Year, Corporate Ladder 1-3 Year, and Corporate Ladder 1-5 Year. Portfolios seek to provide capital preservation, current income, and protect against interest rate fluctuation while providing exposure to their specific asset class.

#### D. Bond Portfolios

The Bond Portfolios category is composed of three all fixed income ETF portfolios: Cash Management, Core Income, Municipal Core Income; and state specific municipal bond mutual funds. The Cash Management Portfolio seeks to provide capital preservation and current income through short duration Treasury and investment grade bond ETFs. The Core Income Portfolio seeks to provide current income and total return through a diversified mix of global bond ETFs. The Municipal Core Income Portfolio seeks to provide tax-efficient current income and total return through a diversified mix of U.S. municipal bond ETFs. The state specific municipal bond portfolios seek to provide capital preservation and income exempt from federal and the respective state's income taxes by investing primarily in investment-grade municipal bonds.

#### E. Buffered Portfolios

The Buffered Portfolios category is composed of two defined outcome and fixed income mutual fund and ETF portfolios: Protection and Global Shield. The Protection Portfolio seeks to provide preservation of principal, current income, and capped capital appreciation through a combination of a treasury money market fund and defined outcome U.S. equity ETFs. The Global Shield Portfolio seeks to provide capped long term capital appreciation while targeting a specific buffer against losses through a diversified mix of all world defined outcome ETFs.

#### F. Multi-Asset Income Portfolios

The Multi-Asset Income Portfolios category is composed of three income oriented portfolios: Income Plus, Income Builder, and Income Opportunities. The Income Plus Portfolio seeks to provide current income and long term inflation protection. The portfolio invests in a globally diversified mix of dividend stock, bond, real estate, and preferred ETFs. The Income Builder portfolio seeks to provide some current income and long term capital appreciation. The portfolio invests in a globally diversified mix of dividend stock, bond, real estate, preferreds, and master limited partnership ETFs. The Income Opportunity Portfolio seeks to provide equity income and long term capital appreciation. The portfolio invests in globally diversified dividend and shareholder yield equity ETFs.

#### G. Core Portfolios

The Core Portfolios category is composed of five broadly diversified portfolios that seek to provide exposure to a specific set of objectives and/or risk tolerance levels. The category is composed of five portfolios: Shield, Cornerstone, Pathway, Horizon, and Voyager. The risk levels of the portfolios range respectively from conservative, moderately conservative, moderate, moderately aggressive, and aggressive. The Shield Portfolio seeks to provide principal purchasing power preservation and current income. The portfolio invests in a diversified mix of treasury, TIPS, real estate, commodity and global equity ETFs. The Cornerstone Portfolio seeks to provide current income generation, and long term capital

appreciation. The portfolio invests in a diversified mix of treasury, TIPS, real estate, commodity and global equity ETFs. The Pathway Portfolio seeks to provide long term capital appreciation and current income generation. The portfolio invests in a diversified mix of treasury, TIPS, real estate, commodity and global equity ETFs. The Horizon Portfolio seeks to provide long term capital appreciation and current income generation. The portfolio invests in a diversified mix of treasury, TIPS, real estate, commodity and global equity ETFs. The Voyager Portfolio seeks to provide long term capital appreciation. The portfolio invests in a diversified mix of global equity ETFs.

#### H. Biblically Responsible Investment (BRI) Portfolios

The BRI category is composed of five broadly diversified portfolios that seek to provide exposure to a specific set of objectives and/or risk tolerance levels. The category is composed of five portfolios: BRI Shield, BRI Cornerstone, BRI Pathway, BRI Horizon, and BRI Voyager. The risk levels of the portfolios range respectively from conservative, moderately conservative, moderate, moderately aggressive, and aggressive. The category's portfolios mirror the allocation of the Core category above, but substitutes exposure to equities with ETFs that adhere to principles outlined by The Biblically Responsible Investment Institute.

#### I. Precious Metal Portfolios

The Precious Metals category is composed of one portfolio: The Gold Bullion Portfolio. The Gold Bullion Portfolio is a single asset portfolio composed of one or more physical gold ETFs. The Gold Bullion Portfolio seeks to provide investors with a convenient way to access exposure to gold bullion.

#### J. Thematic Portfolios

The Thematic Portfolios category allows clients to incorporate a specific investment theme as a satellite position in one of the respective Core Portfolios. The category is composed of three investment themed portfolios: Green Future, Innovation, and Made in America. The Green Future Portfolio is a globally diversified mix of real estate, equity, and commodity ETFs that seek to contribute to an environmentally sustainable economy and resource stewardship. The Innovation Portfolio is a globally diversified mix of real estate, equity, and commodity ETFs that seek to provide exposure to cutting edge technologies and materials. The Made in America Portfolio is a diversified mix of real estate, equity, and commodity ETFs that provide exposure to U.S. based companies and industry. The aforementioned thematic portfolios are capped at a five percent allocation of the respective incorporated asset classes of the client's Core Portfolio(s).

#### K. Bitcoin Portfolio

The Bitcoin category is composed of one portfolio: The Physical Bitcoin Portfolio. The Physical Bitcoin Portfolio is a single asset portfolio composed of or more physically backed bitcoin ETFs. The Bitcoin Portfolio seeks to provide investors with a convenient way to access exposure to physical bitcoin.



## **Risk of Loss**

**Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. You should be prepared to bear the potential risk of loss of principal. There is no guarantee that you will meet your investment goals.** Below is a summary of certain risks associated with an investment in one of our investment strategies. These risk factors include certain risks Polaris believes to be material, significant or unusual and relate to particularly significant strategies or methods of analysis.

*Market Risk:* The value of your holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets. Market declines, such as a recession or other prolonged downturns in investment markets, may adversely affect your investment performance.

*Inflation, Currency, and Interest Rate Risk:* Fluctuations in inflation and interest rates can impact asset prices and portfolio returns. Inflation erodes the value of future dollars, potentially diminishing the purchasing power of your earnings over time. Additionally, rising inflation typically corresponds with higher interest rates, which can lead to depreciation in the value of various types of investments.

*Asset Allocation Strategy Risk:* Asset allocation strategies may lead to concentrations in specific asset classes, industries, or geographic regions. Alternatively, these strategies may promote diversification across various asset classes. Market conditions may favor either concentrated or diversified asset allocation strategies at different times, potentially negatively or positively impacting your portfolio(s). Consequently, you may not always maintain an advantageous asset allocation strategy. In many of its investment strategies, Polaris employs a tactical asset allocation strategy (TAA). TAA can engage in market timing which involves shifting allocations based on market conditions. This can result in frequent trading which may lead to a decrease in performance and/or increase in portfolio risk. Frequent trading can also result in increased brokerage and transaction costs. In addition, TAA may increase the risk of a portfolio. TAA does not guarantee superior returns. Please note that asset allocation strategies are subject to change over time.

*Manager Risk:* Polaris evaluates investment managers to provide exposure to certain asset classes. You are subject to the risk that the manager's investment strategy may not produce the desired results and may have a negative impact on your portfolio's performance.

*Concentration Risk:* Some of our investment strategies may allocate a significant portion of the portfolio to specific asset class(es). Should your portfolio exhibit a high allocation to such asset class(es), any underperformance relative to other market assets could potentially negatively impact your overall investment performance.

*Structured Product Risk:* Some of our investment strategies utilize defined outcome products in their asset allocation, also referred to as structured ETFs, defined outcome ETFs, target outcome

ETFs or buffered outcome ETFs. Defined outcome products seek to offer investors exposure to price return of a broad equity market up to a cap, with built-in downside buffer levels, over a specific outcome period. There is no guarantee the product will be successful in providing the sought-after outcome and/or downside protection. The outcomes that the product seeks to provide may only be realized if you are holding shares on the first day of the outcome period and continue to hold them on the last day of the outcome period. There is no guarantee that the outcomes for an outcome period will be realized or that the fund(s) will achieve its investment objective. Structured products are not backed by the credit of an issuing institution.

*Thematic Investing Risk:* Some of our portfolios allow for investors to incorporate a specific thematic investment in their portfolio strategy. “Thematic” is defined as a top-down investment approach that seeks to capture opportunities associated with megatrends that are currently shaping economics, businesses, and societies around the world. Thematic investing can lead to concentration risk which increases vulnerability to adverse events that may disproportionately affect the underlying investments. Furthermore, thematic strategies are often driven by macroeconomic trends, technological advancements, or societal shifts, which can be unpredictable and subject to rapid change. Consequently, there's a risk of thematic investments underperforming or failing to deliver expected returns if the identified themes do not materialize as anticipated or if market sentiment shifts. Additionally, thematic investing may involve higher volatility compared to more diversified approaches, exposing investors to greater fluctuations in portfolio value.

*Correlation Risk:* Although our aim is to construct diversified portfolios, there is a possibility that various asset classes may experience similar price changes and movements simultaneously, potentially negatively impacting the volatility and performance of your account.

*Mutual Fund & ETF Risks:* Polaris’ investment strategies are typically implemented with mutual funds and ETFs. The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day. The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

*Risks related to Underlying Securities Held by ETFs and Mutual Funds:* Please note that the following risks are not exhaustive and may vary based on specific funds. For a comprehensive list of risks associated with ETFs and mutual funds, we recommend referring to the publicly available prospectus of the respective fund.

*Credit Risk:* Fixed income securities carry the risk of issuer default on interest payments or principal repayment, particularly in cases of bankruptcy, potentially delaying payment and/or resulting in no payment.

*Equity Securities Risk:* Investments in equity securities entail higher risk of loss but also higher potential for gain compared to fixed income securities, with values subject to significant fluctuations over time. Equities can experience permanent capital loss.

*Fixed Income Securities Risk:* Values of fixed income securities fluctuate with changes in interest rates, typically decreasing with rate hikes and increasing with rate reductions. Longer maturity securities may exhibit greater volatility in response to interest rate changes compared to shorter maturity securities. Additionally, fixed income securities are subject to credit risk as noted above.

*Municipal Fixed Income Securities Risk:* Similar to other fixed income investments municipal bonds are subject to interest rate risk and credit risk. The financial health of the issuing state, city, and/or municipality can affect its ability to meet interest and principal payments, which could impact the securities performance. Additionally, these securities may face higher volatility due to localized economic, political, or regulatory changes specific to the state. Additionally changes in tax laws or policies at the federal or state level could alter the tax-exempt status of municipal bonds, affecting after-tax returns for investors.

*Interest Rate Risk:* The performance of investments is influenced by changes in interest rates, particularly affecting bond ETFs, mutual funds and cash allocations in client accounts. Interest rates are sensitive to various factors including government policies, economic conditions, and geopolitical events.

*International Investment Risk:* ETFs and mutual funds may invest globally, exposing investors to risks such as currency fluctuations, reduced liquidity, different regulatory systems, geopolitical uncertainty and increased volatility.

*Commodity Investment Risk:* Commodity prices can exhibit significant volatility driven by factors like supply and demand dynamics, geopolitical events, and economic conditions. Such fluctuations can impact investment values substantially.

*Real Estate Investment Trust (REITs) Risk:* The volatility and performance of REIT investments is heavily influenced by the overall health of the real estate market and broader economic conditions. Interest rate fluctuations can significantly impact REIT values, as rising rates may decrease property values and rental income. Additionally, REITs are susceptible to regulatory changes, including shifts in tax and real estate zoning laws, which can affect profitability.

*Bitcoin Investment Risk:* Bitcoin is a highly volatile asset class with prices subject to significant fluctuations over short periods. This volatility can lead to rapid and substantial gains or losses for investors. Additionally, Bitcoin's market is relatively nascent and unregulated compared to traditional asset classes, which introduces regulatory uncertainty and potential liquidity constraints. Furthermore, security risks such as hacking incidents targeting Bitcoin exchanges or digital wallets may result in loss of assets.

*Liquidity Risk:* Liquidity risk arises when securities are difficult to buy or sell in a timely manner without impacting market value. ETFs or mutual funds in client accounts may face trading difficulties due to limited market liquidity in fund shares or underlying securities, potentially causing delays in purchase or sale orders and exposing clients to liquidity risk.

*Technology Risk:* Polaris utilizes and relies on a high degree of investment management

software to construct and manage its portfolios. The portfolio's automation and computerization rely on third-party software and hardware. Polaris may face unforeseen disruptions due to software or hardware malfunctions, whether caused by defects, security breaches, viruses, or other factors.

*Cyber Security Risk:* With the increasing use of technologies in business operations, Polaris as well as ETFs, mutual funds, brokerage firms and other service providers may face heightened exposure to operational and information security risks related to cyber threats. These risks encompass potential breaches in cyber security, whether arising from deliberate attacks or inadvertent events. Such breaches could involve unauthorized access to digital systems, theft of assets or sensitive information, disclosure of proprietary data, data corruption, or disruption of operations, including denial-of-service attacks on websites. Cyber security failures may subject Polaris, ETFs, mutual funds, brokerage firms and/or other service providers to regulatory penalties, reputational harm, additional compliance expenses for remedial actions, and financial losses. While Polaris has implemented policies and procedures aimed at mitigating cyber security risks, there is no guarantee that these measures will fully prevent or alleviate the impact of such failures.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each client should understand and be willing to bear. Clients are reminded to discuss these risks with their financial advisor.**

## **Item 9 – Disciplinary Information**

There are no legal, regulatory, or disciplinary events involving Polaris or its Supervised Persons.

## **Item 10 – Other Financial Industry Activities and Affiliations**

Polaris does not have any other financial industry activities and/or affiliations. Michael McDermott is also an Investment Advisor Representative of Richr Money LLC. If client(s) the advisory services of Mr. McDermott through Richr Money, LLC, he may receive additional fees or other compensation in his capacity as an investment adviser representative. These fees would be in addition to any fees charged for the advisory services provided through Polaris.

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

### **Code of Ethics**

Polaris has implemented a Code of Ethics that defines our fiduciary commitment to each client. The Code of Ethics applies to all persons associated with Polaris. The Code of Ethics provides general ethical guidelines and specific instructions regarding our duties to our clients. We owe a duty of loyalty, fairness, and good faith towards each of our clients. It is our obligation to adhere not only to the specific provisions of the Code of Ethics, but also to the general principles that guide the Code of Ethics. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code of Ethics please email [support@partnerpf.com](mailto:support@partnerpf.com).

### Personal Trading with Material Interest

Polaris allows its Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of our clients. We do not act as principal in any transactions. We do not act as the general partner of a fund or advise an investment company. We do not have a material interest in any securities traded in client accounts.

### Personal Trading in Same Securities as Clients

Polaris allows its Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of clients. Owning the same securities that we recommend (purchase or sell) to clients presents a potential conflict of interest that, as fiduciaries, we must disclose to clients and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, the Code, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Polaris may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its clients can potentially be violated if personal trades are made with more advantageous terms than client trades, or by trading based on material non-public information. This risk is mitigated by thorough review and reporting of personal securities trades by its Supervised Persons for review by the Supervised Person's supervisor or the Chief Compliance Officer (CCO). We have also adopted written policies and procedures to detect the misuse of material, non-public information. In addition, the Code governs gifts and entertainment given by and provided to Polaris, outside employment activities of supervised persons, employee reporting, sanctions for violations of the Code, and records retention requirements for various aspects of the Code.

### Personal Trading at Same Time as Client

While Polaris allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of clients, such trades are typically aggregated with client orders or traded afterwards. At no time will Polaris, or any associated person of Polaris, transact in any security to the detriment of any client.

## **Item 12 – Brokerage Practices**

### Broker-Dealer Selection

Our advisory services currently rely on, and require clients to use Altruist Financial LLC and/or Interactive Brokers LLC. Polaris evaluates brokerage services based on the following factors:

- Commission Rates
- Execution Capability
- Operational Capability
- Responsiveness & Communication
- Financial Strength
- Trade & Recordkeeping Practices
- Cybersecurity
- Technology

All clients are serviced on a directed brokerage basis, where Polaris will place trades within the established account(s) at Altruist Financial LLC and/or Interactive Brokers LLC. Further, all client accounts are traded within their respective account(s). Polaris will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other client accounts (i.e., purchase of a security into one client account from another client's

account(s). Polaris will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by Altruist Financial LLC or Interactive Brokers LLC.

Polaris seeks best execution; however, Polaris cannot guarantee that a client will receive best execution because Polaris does not control either Altruist Financial LLC or Interactive Brokers LLC practices. By directing brokerage Polaris may be unable to achieve the most favorable execution of client transactions and it may result in higher transaction costs for clients. We do not permit clients to direct brokerage. Please note not all investment advisors require their Clients to use a directed brokerage.

As a registered investment adviser, we have access to the institutional platform of the directed account custodian. As such, we will also have access to research products and services from the account custodian and/or another brokerage firm(s). These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms, and are not considered to be paid for with soft dollars. However, clients should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.

The primary objective in placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the custodian. Polaris will execute its transactions through the custodian as authorized by the client. Polaris may aggregate orders in a block trade or trades when securities are purchased or sold through the custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular client accounts. Accounts for the firm or associated persons may be included in the block.

#### Soft Dollars

Polaris does not have any soft dollar arrangements with Altruist Financial LLC or Interactive Brokers LLC, or any broker-dealer.

#### Brokerage Referrals

Neither Polaris nor any of its related persons receive client referrals from any broker dealers.

### **Item 13 – Review of Accounts**

Client accounts and securities are regularly monitored by our software and financial advisors. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the client.

In addition, to the client’s annual review, further reviews may be triggered due to:

- Client request
- Changes in a client’s life events, financial situation, risk tolerance,
- Large deposits or withdrawals of client funds.
- Changes in investment strategy
- and/or macro conditions.

Clients are encouraged to notify their advisor or Polaris if any of the above listed changes occur or if a financial situation may adversely affect the client’s investment strategy.

Clients receive brokerage statements no less than quarterly from Altruist Financial LLC and/or Interactive Brokers LLC. These brokerage statements are sent directly from the custodian to the client. The client may also establish electronic access to the custodian’s website so that the client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the client’s account(s).

### **Item 14 – Client Referrals & Other Compensation**

Polaris is a fee-only advisory firm, who, in all circumstances, is compensated solely by its clients. Polaris does not receive commissions or other compensation from product sponsors, broker-dealers or any unrelated third party.

Polaris may refer clients to various third parties to provide certain financial services necessary to meet the goals of its clients. We make these professionals available to you as a convenience only and neither our firm nor persons associated with our firm are compensated if you engage these unaffiliated service providers. Clients are not obligated to work with the professionals made available to them by our firm and clients do so at their sole discretion. Polaris is not responsible or liable for any services provided to clients by these outside professionals and any use of these other professionals by clients will not affect the advisory fee clients pay to Polaris. If clients choose to work with an unaffiliated service provider made available to them by Polaris, clients engage these other professionals directly at their own expense. These arrangements, and any related fees, would be separate and distinct from any investment advisory services provided by Polaris. Likewise, Polaris may receive referrals of new clients from a third-party.

Polaris provides wealth management programs to financial institutions, such as banks and credit unions (Program Partners). Polaris is not affiliated with any Program Partners. Program Partners provide referrals to their clients to utilize Polaris investment advisory services. In exchange for the referrals from the Program Partners Polaris pays the Program Partner a referral fee, which represents a portion of the fees generated from the investment advisory accounts opened and maintained by clients of the Program Partner. The exact referral fee paid by Polaris is negotiated with each Program Partner.

In no instance will the Program Partner relationship result in higher fees being charged to clients

referred to Polaris. Polaris will not charge clients any additional fees or expenses because of the Program Partner agreement. Clients will receive a written disclosure statement regarding these arrangements in accordance with the requirements of Rule 206(4)-3 under the Advisers Act.

A referral by a Program Partner should not be viewed by a client as an endorsement of Polaris' services.

The payment of referral fees by Polaris to the Program Partner creates a conflict of interest by incentivizing the Program Partner to make referrals to Polaris. The Program Partner receives the same referral fee from Polaris regardless of the type of account or investment clients have managed by Polaris.

The financial advisor who recommends investment products and services to clients is an employee of Polaris Financial. The financial advisor is not compensated by the Program Partners.

### **Item 15 – Custody**

Polaris requires clients utilize either Altruist Financial LLC or Interactive Brokers LLC to custody their funds and securities. Polaris does not accept or maintain custody of any client accounts, except for the authorized deduction of fees. Trade confirmations and statements are made available electronically to all clients directly from Altruist Financial LLC and/or Interactive Brokers LLC. Clients are encouraged to carefully review confirmations and statements and to call with any questions/concerns. Polaris encourages clients to review the monthly statements provided by Altruist Financial LLC and Interactive Brokers LLC.

### **Item 16 – Investment Discretion**

Polaris generally has discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by Polaris. Discretionary authority will only be authorized upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Polaris will be in accordance with each client's investment objectives and goals.

### **Item 17 – Voting Client Securities**

Polaris does not accept proxy-voting responsibility for any client. Clients will receive proxy statements directly from Altruist Financial LLC and/or Interactive Brokers LLC. The client retains the sole responsibility for proxy decisions and voting. Polaris will assist in answering questions relating to proxies. Clients can contact their advisor either via email or phone with questions relating to proxy-voting and/or solicitations.

### **Item 18 – Financial Information**

Polaris is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. Polaris is not subject to any financial commitment that impairs its ability to meet contractual and fiduciary commitments to its clients.





**Form ADV Part 2B – Brochure Supplement for**  
**Michael J. McDermott**  
**Chief Compliance Officer, Financial Advisor**  
**March 31, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Michael J. McDermott (CRD# 6596088) in addition to the information contained in the Polaris Financial, LLC (“Polaris” or the “Advisor”) (CRD # 281952) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Polaris Disclosure Brochure or this Brochure Supplement, please contact us via our website <http://partnerpf.com>.

Additional information about Mr. McDermott is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6596088.

**Item 2 – Educational Background & Business Experience**

Michael J. McDermott serves as the Chief Compliance Officer of Polaris and as a financial advisor to clients of Polaris. Mr. McDermott earned a Bachelor of Science from Bentley University. Mr. McDermott is thirty three years old. Additional information regarding Mr. McDermott’s employment history is below.

Employment History:

Financial Advisor, Polaris Financial, LLC	12/2015 to Present
Advisor, Richr Money LLC	05/2023 to Present
Financial Advisor, Dough Wealth, LLC	02/2021 to 04/2022
Senior Solutions Consultant, Oracle	08/2015 to 8/2022
Operations Analyst, Bright Horizons Family Solutions	05/2015 to 07/2015
Finance Associate, iSoftStone, Inc.	05/2011 to 05/2015

**Item 3 – Disciplinary Information**

There are no legal, civil or disciplinary events to disclose regarding Mr. McDermott. Mr. McDermott has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. McDermott.

Securities laws require an advisor to disclose any instances where the advisor or its advisory

persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. McDermott.

We do encourage you to independently view the background of Mr. McDermott on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6596088.

**Item 4 – Other Business Activities**

Mr. McDermott works as a financial advisor for Richr Money.

**Item 5 – Additional Compensation**

Mr. McDermott received compensation from his duties as a financial advisor for Richr Money.

**Item 6 – Supervision**

Mr. McDermott serves as the Principal and Chief Compliance Officer of Polaris. Mr. McDermott can be reached at (708)-487-1458.

As indicated above, Polaris has implemented a Code of Ethics, an internal compliance document that guides Supervised Persons in meeting their fiduciary obligations to clients of Polaris. Further, Polaris is subject to regulatory oversight by various agencies. These agencies require registration by Polaris and its Supervised Persons. As a registered entity, Polaris is subject to examinations by regulators, which may be announced or unannounced. Polaris is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

**Form ADV Part 2B – Brochure Supplement for**  
**Evan Kulak**  
**Financial Advisor**  
**March 31, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Evan A. Kulak (CRD# 6284773) in addition to the information contained in the Polaris Financial, LLC (“Polaris” or the “Advisor”) (CRD # 281952) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Polaris Disclosure Brochure or this Brochure Supplement, please contact us via our website <http://partnerpf.com>.

Additional information about Mr. Kulak is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6284773.

**Item 2 – Educational Background and Business Experience**

Evan A. Kulak is dedicated to advising clients of Polaris in his role as a Financial Advisor at Polaris. Mr. Kulak earned a Bachelor of Arts from Bowdoin College. Mr. Kulak is thirty two years old. Additional information regarding Mr. Kulak’s employment history is included below.

Employment History:

Financial Advisor, Polaris Financial, LLC	12/2015 to Present
Financial Advisor, Dough Wealth, LLC	02/2021 to 03/2023
APM, Fifth Third Private Bank	06/2015 to 04/2016
Operations Analyst, Cadence Capital Management	11/2014 to 06/2015
Analyst, Merrill Edge	06/2013 to 01/2014

**Item 3 – Disciplinary Information**

There are no legal, civil or disciplinary events to disclose regarding Mr. Kulak. Mr. Kulak has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Kulak.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges

violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Kulak.

We do encourage you to independently view the background of Mr. Kulak on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6284773.

**Item 4 – Other Business Activities**

Mr. Kulak has no other business activities.

**Item 5 – Additional Compensation**

Mr. Kulak does not receive additional compensation.

**Item 6 – Supervision**

Mr. Kulak serves as a Financial Advisor of Polaris. Mr. Kulak can be reached at (708)- 996-0213.

As noted above, Polaris has implemented the Code of Ethics, an internal compliance that guides Supervised Persons in meeting their fiduciary obligations to clients of Polaris. Further, Polaris is subject to regulatory oversight by various agencies. These agencies require registration by Polaris and its Supervised Persons. As a registered entity, Polaris is subject to examinations by regulators, which may be announced or unannounced. Polaris is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# Privacy Policy

**Effective Date: March 31st, 2024**

## Our Commitment to You

Polaris is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”).

We understand that you have entrusted us with your private information. Polaris (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to help ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Polaris does not sell your nonpublic personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal nonpublic information is collected and used are set forth in this Policy. By law, we are required to notify you of our privacy policy on an annual basis. Although we reserve the right to change our policy, we will tell you of the changes promptly.

## Why you need to know?

Registered Investment Advisers (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information. RIAs are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality. .

## What information do we collect from you?

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. Below are some examples. When you are no longer our customer, we may continue to share your information only as described in this notice.

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect clients' personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

**Cookies.** In addition, we may use "cookies" on certain pages of our Site. Cookies are small files that can be used to track a user's steps or automatically generate a user's password. Some features of our website may only be available through the use of a cookie. Among other things, cookies allow you to enter your password less frequently during a session. Cookies can also help us provide information which is targeted to your interests. Cookies are stored on your hard drive, not on our Site. Most, but not all, cookies are automatically deleted at the end of a session. You may decline our cookies if your browser permits, although your use of the Site may then be restricted (as noted above).

**Third Party Analytics.** We and the third-party technology providers, ad exchanges, ad networks, advertisers, agencies, ad exchanges, and ad servers with which we work may use third-party analytics services to compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. You consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<p><b>Servicing our Clients</b>                      We may share nonpublic personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, trading exchanges, technology platforms, and other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.</p>	Yes	No

<p><b>Marketing Purposes</b>  Polaris does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Polaris or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b></p>	No	Not Shared
<p><b>Authorized Users</b>  Your nonpublic personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).</p>	Yes	Yes
<p><b>Information About Former Clients</b>  Polaris does not disclose and does not intend to disclose, nonpublic personal information to non-affiliated third parties with respect to persons who are no longer our Clients.</p>	No	Not Shared

In accordance with any state or federal laws, we may be required to release information in certain circumstances (i.e., protection against fraud, responding to a subpoena, or reporting to a credit bureau).

**FEDERAL & STATE LAW ALLOWS YOU TO LIMIT SHARING – OPTING OUT**

Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: sharing for non-affiliates’ everyday business purposes – information about your creditworthiness; or sharing with affiliates or non-affiliates who use your information to market to you. State laws and individual companies may give you additional rights to limit sharing.

**State-specific Regulations**

Massachusetts	<p>In response to a Massachusetts law, clients must “opt-in” to share nonpublic personal information with non-affiliated third parties before any personal information is disclosed. We may disclose nonpublic personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.</p>
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### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us via our website <http://partnerpf.com>.

**Please notify us immediately if you choose to opt out of these types of sharing or if you have any questions.** Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.