

Acrylic Financial, Inc.

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Acrylic Financial, Inc. If you have any questions about the contents of this brochure, please contact us at (833) 422-7954 or by email at info@acrylicfinancial.com. 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.

Additional information about Acrylic Financial, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. Acrylic Financial, Inc.'s CRD number is: 288263.

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Registration as an investment adviser does not imply a certain level of skill or training.

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Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Acrylic Financial, Inc. on 01/16/2019 are described below. Material changes relate to Acrylic Financial, Inc.'s policies, practices or conflicts of interests.

- Acrylic Financial, Inc. has updated Item 10.A to disclose their arrangement with Brooklight Place Securities.
- Acrylic Financial, Inc. has updated Item 10.C to disclose Charles Truhlar and David Racich's additional outside business activities.
- Acrylic Financial, Inc. has updated Item 5 to disclose they bill in arrears for Portfolio Management Services.
- Acrylic Financial, Inc. has updated Item 8 to add Technical analysis.
- Acrylic Financial, Inc. has updated their disclosures in Item 10.C.
- Acrylic Financial, Inc. has updated brokerage practices (Item 12).
- Acrylic Financial, Inc. has updated Item 19 to include the required addendum for Kansas clients.
- Acrylic Financial, Inc. receives no research, product, or services other than execution from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits"). (Item 12)
- Acrylic Financial, Inc. has updated their fee schedule. (Item 5)
- Acrylic Financial, Inc. has added the custodian Broadridge Business Process Outsourcing, LLC (MSCS Financial Services, LLC) (Item 12).

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Item 4: Advisory Business

A. Description of the Advisory Firm

Acrylic Financial, Inc. (hereinafter “Acrylic”) is a Corporation organized in the State of Arizona. The firm was formed in February 2017, and the principal owners are David Racich, Charles Anthony Truhlar and Ashley Megan Racich. Charles Anthony Truhlar will serve as designated principal for the firm in Illinois.

B. Types of Advisory Services

Portfolio Management Services

Acrylic offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Acrylic creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Acrylic evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Acrylic will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Acrylic seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Acrylic’s economic, investment or other financial interests. To meet its fiduciary obligations, Acrylic attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Acrylic’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Acrylic’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Acrylic may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Before selecting other advisers for clients, Acrylic will always ensure those other advisers are properly licensed or registered as an investment adviser. Acrylic conducts due diligence on any third-party investment adviser, which may involve one or more of the following: phone calls, meetings and review of the third-party adviser's performance and investment strategy. Acrylic then makes investments with a third-party investment adviser by referring the client to the third-party adviser. These investments may be allocated either through the third-

party adviser's fund or through a separately managed account managed by such third party adviser on behalf of Acrylic's client. Acrylic may also allocate among one or more fund advisers. Acrylic will review the ongoing performance of the third-party adviser as a portion of the client's portfolio.

Subadvisor Services

Acrylic may also act as a subadvisor to advisers unaffiliated with Acrylic. These third-party advisers would outsource portfolio management services to Acrylic. This relationship will be memorialized in each contact between Acrylic and the third-party adviser.

Financial Planning

Financial plans and financial planning may include but are not limited to: investment planning; insurance planning; tax planning & integration, retirement planning, education planning and debt/credit planning. It can take at least 1-10 hours to complete a financial plan, depending on the case details. Acrylic will not charge clients a fee for any hours worked on a financial plan that would exceed 10 hours.

Investment Planning: Creating an investing strategy to help the client meet long and short term goals, such as retirement or buying a house. By taking into account risk tolerance, diversification and asset allocation, investment plans are designed to help the client decide how much to invest in stocks, bonds, cash and real estate in order to maximize returns for the stated goals. May also assist in choosing amongst a broad range of investments available, including those inside a company sponsored retirement plan.

Insurance Planning: Insurance planning includes evaluating risks and determining the proper insurance coverage to mitigate those risks. The principal goal of insurance planning is to identify and analyze risk factors in life and seek proper coverage for those risks. All lines of insurance may or may not be included in any individual insurance planning agreement.

Tax Planning & Integration: Tax planning include timing of income, size, and timing of purchases, and planning for other expenditures. Also, the selection of investments and types of retirement plans must complement the tax filing status and deductions to create the best possible outcome. Tax efficiency of investments, income, deductions, and filing status are all considered.

Retirement Planning: Retirement planning includes determining retirement income goals and the actions and decisions necessary to achieve those goals. Retirement planning includes identifying sources of income, estimating expenses, implementing a savings program and managing assets. Social Security planning is included in this offering. Future cash flows are estimated to determine if the retirement income goal will be achieved. Other non-financial aspects taken into consideration include lifestyle choices, where to live, when to completely quit working, etc.

Education Planning: Education planning includes financial considerations for higher education funding. Income, time horizon, geography, institution preference, are taken into consideration. Most appropriate investment vehicles are analyzed and recommended.

Debt/Credit Planning: Debt/Credit planning includes establishing budgets, analyzing income and expenses, creating an income statement, analyzing debt vehicles, and making recommendations for efficiencies.

Services Limited to Specific Types of Investments

Acrylic generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities, non-U.S. securities and, although Acrylic primarily recommends ETF's. Acrylic may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

Acrylic will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by Acrylic on behalf of the client. Acrylic may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

We practice goal-oriented financial planning advice intended as a supplement to our portfolio management services. We may utilize third party planning software in the analysis and quantification of your current financial positions, as well as the analysis of your financial goals and objectives.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. Acrylic does not participate in wrap fee programs.

E. Assets Under Management

Acrylic has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$10,950,586	\$0	December 2019

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Total Assets Under Management	Annual Fees
\$0 - \$249,999	1.80%
\$250,000 - \$999,999	1.75%
\$1,000,000 & Above	1.65%

Lower fees for comparable services may be available from other sources.

For new accounts, Acrylic will bill the pro-rated amount for the remainder of the initial month, based on the average daily balance in the billing period.

An average of the daily balance in the client's account throughout the billing period is used to determine the market value of the assets upon which the advisory fee is based. There is a \$50.00 first year setup fee per account established. This fee is deducted one time by the custodian directly from your account.

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of Acrylic's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice.

Fees are paid monthly in arrears. The advisory fee is calculated using the value of the assets in the Account on the last business day of the month. Management Fees for the initial month shall be calculated on a pro rata basis commencing on the day the Assets are initially designated to us for management under this Agreement.

Selection of Other Advisers Fees

Acrylic may engage in the selection of third-party money managers, but does not have any such arrangements in place at this time. Acrylic will receive its standard fee on top of the fee paid to the third party adviser. This relationship will be memorialized in each contract between Acrylic and each third-party adviser. The fees are in excess of that normally charged in the industry, and similar advisory services can be obtained for less. Combined advisory fee charged by Acrylic and third-party advisers will not exceed 3%. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

Subadviser Services Fees

Acrylic may also act as a subadviser to unaffiliated third-party advisers. Subadvisor fees range from 40 bps – 55 bps depending on our agreement with the advisor. Fees are collected by Acrylic in addition to the advisor fees from the custodian, per the written advisor agreement between the client and the advisor. The notice of termination requirement and payment of fees for subadviser services will depend on the specific third-party investment adviser engaging Acrylic as subadviser. This relationship will be memorialized in each contract between Acrylic and each third-party adviser. Fees charged by Acrylic and third-party advisers will not exceed 3%. The fees will not exceed any limit imposed by any regulatory agency.

Financial Planning Fees

Fixed Fees

The negotiated fixed rate for creating client financial plans is between \$50 and \$5,000. Fixed fees are available as a single service (a la carte) financial planning services, and only if the scope of the engagement can be well defined in advance after review of the initial consultation information (there is no charge for initial consultations). The fixed fee will vary based on the Acrylic's opinion of the complexity of the subject and the length of time and resources necessary to complete the plan. The fixed fee will also vary based on the skill and experience of the individual advisor providing the service. Acrylic reviews and requests for a fixed fee service to determine, based on the scope of the engagement, if a fixed fee will be in the client's best interest vs. an hourly fee. Fixed fees will not differ between individual or corporation based on that merit alone, but rather complexity and the scope of the service. Acrylic will consider the complexity of the plan and nature of the client in order to determine whether it would recommend the fixed financial planning fee or the hourly financial planning to a client.

Hourly Fees

The hourly fee for these services is between \$100 and \$265. This hourly fee range varies depending on the skill and experience of the advisor, and the level of support necessary depending on the case complexities. The hourly fees apply to services detailed in the financial planning agreement. It can take at least 1-10 hours to complete a financial plan, depending on the case details.

In offering financial planning, a conflict exists between the interests of the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser. This statement is required by California Code of Regulations, 10 CCR Section 260.235.2.

Clients may terminate the agreement without penalty, for full refund of Acrylic's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice. In the event of the early termination of the contract prior to the completion of the financial plan, Acrylic will deliver upon termination that portion of the financial plan that has been prepared to the client.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in arrears.

Payment of Selection of Other Advisers Fees

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected.

Payment of Subadviser Fees

Subadviser fees may be withdrawn from clients' accounts or clients may be invoiced for such fees, as disclosed in each contract between Acrylic and the applicable third-party adviser. Fees are collected monthly in advance.

Payment of Financial Planning Fees

Financial planning fees are paid via check and wire.

Fixed financial planning fees are paid 100% in advance, but Acrylic neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance.

Hourly financial planning fees are collected in advance, but Acrylic neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Acrylic. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

Acrylic collects fees in advance and arrears. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check, or return deposit back into the client's account.

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

E. Outside Compensation For the Sale of Securities to Clients

Charles Anthony Truhlar and John Michael Cox, in their outside business activities (see Item 10 below) are licensed to accept compensation for the sale of investment products to Acrylic clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of securities or investment products for which the supervised persons receives compensation, Acrylic will document the conflict of interest in the client file and inform the client of the conflict of interest. Clients always have the right to decide whether to purchase Acrylic -recommended products and, if purchasing, have the right to purchase those products through other brokers or agents that are not affiliated with Acrylic. Acrylic will disclose if they receive more than 50% of revenue from advisory clients results from commissions and other compensations. Advisory fees are not charged in addition to compensation.

Commissions are not Acrylic's primary source of compensation for advisory services. Advisory fees that are charged to clients are not reduced to offset the commissions or markups on securities or investment products recommended to clients. Acrylic and its supervised persons accept compensation for the sale of securities or other investment products

Acrylic has a selling agreement in place with Brooklight Place Securities. Acrylic will provide an asset-based fee to Brooklight Place Securities for any registered representatives that become investment adviser representatives of Acrylic. Acrylic will provide 10 basis points (0.10%) on new Assets Under Management ("AUM") acquired after the Investment Adviser Representative becomes a registered representative. Fees will be paid on a monthly basis directly from Acrylic in accordance with the billing agreement provided on Acrylic account opening.

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

Acrylic does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

Acrylic generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Other Investment Advisers
- ❖ Corporations

There is no account minimum for any of Acrylic's services.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Acrylic's methods of analysis include Fundamental analysis, Technical Analysis and Modern portfolio theory.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Investment Strategies

Acrylic uses long term trading and short term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an

investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Selection of Other Advisers: Although Acrylic will seek to select only money managers who will invest clients' assets with the highest level of integrity, Acrylic's selection process cannot ensure that money managers will perform as desired and Acrylic will have no control over the day-to-day operations of any of its selected money managers but will monitor the investments of the Account managed by other third-party investment advisers. Acrylic would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment “style drift” or even regulatory breaches or fraud.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Clients can obtain the disciplinary history, if any, of Acrylic and its representatives from the Massachusetts Securities Division upon request. Please also see below for a discussion of applicable disciplinary history. The number for the division is (617) 727-3548.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Charles Anthony Truhlar, John Michael Cox and Ryan Noterman are also registered representatives of Brooklight Place Securities, Inc.

Acrylic has a selling agreement in place with Brooklight Place Securities. Acrylic will provide an asset-based fee to Brooklight Place Securities for any registered representatives that become investment adviser representatives of Acrylic. Acrylic will provide between 5 (0.05%) and 10 basis points (0.10%) on new Assets Under Management ("AUM") acquired after the Investment Adviser Representative becomes a registered representative. Fees will be paid on a monthly basis directly from Acrylic in accordance with the billing agreement provided on Acrylic account opening.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Acrylic nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Mr. Truhlar is a licensed insurance agent, Owner and President with Charles Truhlar & Associates and can effect transactions in various insurance products, including life, health, disability, long-term care, and annuities for commission-based compensation. The firm expects that clients to whom it offers advisory services may also be clients for whom Mr. Truhlar acts as an insurance agent. Clients are instructed that the fees paid to Acrylic for advisory services are separate and distinct from the commissions earned for placing the client in insurance products. Clients to whom Acrylic offers advisory services are informed that they are under no obligation to use Mr. Truhlar or any of our affiliated persons or entities for insurance services and may use the insurance brokerage firm and agent of their choice.

Mr. Truhlar is a registered representative and director of Brooklight Place Securities. From time to time, he may offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. The firm expects that clients to whom it offers advisory services may also be clients for whom Mr. Truhlar acts as a Registered Representative. Clients are instructed that the fees paid to Acrylic for advisory services are separate and distinct from the commissions earned for placing the client in commissionable products as a Registered Representative. Clients to whom Acrylic offers advisory services are informed that they are under no obligation to use Mr. Truhlar or any of our affiliated persons or entities Registered Representative services and may use the Broker Dealer and Registered Representative of their choice.

Mr. Truhlar is Chief Distribution officer of Brokers Alliance Inc., (BA) an insurance wholesaling company. In his role Mr. Truhlar is responsible for overseeing distribution and operations for the company. BA at times will refer an insurance agent who is also an advisor to Acrylic Financial, Inc (AF) for a potential affiliation of that advisor to the firm. BA at times will also refer insurance agents who are looking to become a registered Investment Adviser Representative to the firm for potential affiliation. Advisors of AF may also have an outside affiliation through a separate agency (or individually as an agent) for the placement of insurance products. The agency or individual is licensed as an independent contractor of the insurance company and places insurance products directly with the insurance company of their choice. Insurance Marketing Organizations (IMO) exists within this independent structure to provide a distribution channel on behalf of the insurance companies. In the event an independent agent elects to partner with the IMO BA, BA will be compensated direct from the insurance company. Mr. Truhlar receives salary and bonus from BA and therefore a conflict of interest may occur. This conflict is mitigated as independent agents may work with any insurance company and any IMO of their choosing,

one of which may be BA. The commission structure built into insurance products is predetermined by the insurance companies and is not altered by the IMO. The product purchased by the client is issued by the insurance company and is no way altered by the IMO or the insurance agent. Furthermore, the client has no obligation to do business with the advisor/agent. Acrylic always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any representative of Acrylic in such individual's outside capacities.

David Racich is CEO of Brokers Alliance, Inc. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is Founder/CEO of Integrated Io, LLC. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is Founder/CEO of Life's Best Insurance. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is a Board member of Brooklight Place Securities, Inc. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is Founder/CEO of Launch Financial, LLC. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is Founder/CEO of BDR Holding Group. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is Founder/CEO of Emerson Art Gallery, LLC. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is Partner of TRAC Enterprises LLC. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

David Racich is Partner of Shadow #5 LLC. Due to David Racich's ownership in Acrylic, this could result in a conflict of interest, even though he doesn't offer products from this activity or provide investment advice in any capacity for Acrylic, this is still required to be disclosed.

Mr. Gierke is a registered representative. From time to time, he may offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. The firm expects that clients to whom it offers advisory services may also be clients for whom Mr. Gierke acts as a Registered Representative. Clients are instructed that the fees paid to Acrylic for advisory services are separate and distinct from the commissions earned for placing the client in commissionable products as a Registered Representative. Clients to whom Acrylic offers advisory services are informed that they are under no obligation to use Mr. Gierke or any of our affiliated persons or entities Registered Representative services and may use the Broker Dealer and Registered Representative of their choice.

Mr. Gierke is licensed as an insurance agent and can effect transactions in various insurance products, including life, health, disability, long-term care, and annuities for commission-based compensation. The firm expects that clients to whom it offers advisory services may also be clients for whom Mr. Gierke acts as an insurance agent. Clients are instructed that the fees paid to Acrylic for advisory services are separate and distinct from the commissions earned for placing the client in insurance products. Clients to whom Acrylic offers advisory services are informed that they are under no obligation to use Mr. Gierke or any of our affiliated persons or entities for insurance services and may use the insurance brokerage firm and agent of their choice.

Mr. Gierke will refer clients to Cornerstone Financial Group for property and casualty quotes as of 10/1/2015. 2 hours per month are spent on this activity during securities trading hours and less than 1 ½ during outside trading activities.

Alfreda Delores Anderson is a licensed insurance agent. From time to time, she will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Acrylic always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Acrylic in their capacity as a licensed insurance agent.

Alfreda Delores Anderson is a board member of National Society of Black Engineers.

Alfreda Delores Anderson is the Acting Treasurer of the NAACP in San Diego, which is the National Association for the Advancement of Colored People, is a nonprofit civil rights organization. Her responsibilities include attending Executive & General meetings once a month, voting on plans & activities, representing. 10 hours a month are devoted to this activity during and outside of trading hours. No yearly compensation is derived from this activity.

Marina Laura Deering is a registered representative. From time to time, she will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Acrylic always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services any representative of Acrylic in such individual's outside capacity.

John Michael Cox is the owner & an insurance agent of JMC Agency Inc. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Acrylic always acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any Acrylic representative in such individual's outside capacities.

John Michael Cox is the owner of J&S Farms.

John Michael Cox is the owner/Managing Member of Legacy Advance Solutions.

John Michael Cox is a registered representative of Brooklight Place Securities, Inc. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Acrylic Financial, Inc always acts in the best interest of the client, including with respect to the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any Acrylic Financial, Inc representative in such individual's outside capacities.

Marty Grzynkowicz is a registered representative. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Acrylic Financial, Inc. always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services any representative of Acrylic Financial, Inc. in such individual's outside capacity.

Marty Grzynkowicz is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Acrylic Financial, Inc. always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Acrylic Financial, Inc. in their capacity as a licensed insurance agent.

Marty Grzynkowicz is an agency principal of Cornerstone Financial Group.

Hugo Enrique Neyra is the owner of Urban Desert LLC and owns 20% of Suntek Lawn Care Franchising a Green Power Landscape Maintenance company.

Ryan Noterman is a registered representative. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Acrylic Financial, Inc. always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services any representative of Acrylic Financial, Inc. in such individual's outside capacity.

Ryan Noterman is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Acrylic Financial, Inc. always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Acrylic Financial, Inc. in their capacity as a licensed insurance agent.

All material conflicts of interest under California Code of Regulations Section 260.238(k) are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonable expected to impair the rendering of unbiased and objective advice.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

Acrylic may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Clients will pay Acrylic its standard fee in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between Acrylic and each third-party advisor. The fees will not exceed any limit imposed by any regulatory agency. Acrylic will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. Acrylic will ensure that all recommended advisers are licensed or notice filed in the states in which Acrylic is recommending them to clients.

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

A. Code of Ethics

Acrylic has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of

Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Acrylic's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

Acrylic does not recommend that clients buy or sell any security in which a related person to Acrylic or Acrylic has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Acrylic may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Acrylic to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Acrylic will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Acrylic will actively and automatically monitor all IAR's personal investment accounts, and maintain a restricted security list. Any securities on the restricted list (which are those [Acrylic uses in its] models for clients) are flagged and reviewed to confirm that no trading occurred on or near the time the Acrylic models were traded (which is monthly).

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of Acrylic may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Acrylic to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Acrylic will never engage in trading that operates to the client's disadvantage if representatives of Acrylic buy or sell securities at or around the same time as clients.

Acrylic will actively and automatically monitor all IAR's personal investment accounts, and maintain a restricted security list. Any securities on the restricted list (which are those [Acrylic uses in its] models for clients) are flagged and reviewed to confirm that no trading occurred on or near the time the Acrylic models were traded (which is monthly).

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on Acrylic's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Acrylic may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Acrylic's research efforts. Acrylic will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Acrylic will require clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC and Broadridge Business Process Outsourcing, LLC (MSCS Financial Services, LLC)

1. *Research and Other Soft-Dollar Benefits*

Acrylic receives no research, product, or services other than execution from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits").

2. *Brokerage for Client Referrals*

Acrylic receives 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*

Acrylic will require clients to use a specific broker-dealer to execute transactions. Acrylic will require clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc and Broadridge Business Process Outsourcing, LLC (MSCS Financial Services, LLC). Member FINRA/SIPC. There is no conflict of interest, as the broker-dealer is not an affiliate or related person of Acrylic. By directing brokerage, Acrylic may be unable to achieve most favorable execution of client transactions which could cost clients money in trade execution. Not all advisers require or allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

If Acrylic buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Acrylic would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would

be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. Acrylic would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for Acrylic's advisory services provided on an ongoing basis are reviewed at least Annually by each Investment advisor representative who is responsible for the client accounts, with regard to clients' respective investment policies and risk tolerance levels.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Charles Truhlar, Chief Compliance officer. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, Acrylic's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of Acrylic's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Acrylic receives compensation via its arrangement with its underlying subadvisers.

B. Compensation to Non - Advisory Personnel for Client Referrals

Solicitor relationships will be fully disclosed to each Client to the extent required by applicable law. Acrylic will ensure each solicitor is exempt, notice filed, or properly registered in all appropriate jurisdictions. Solicitors will receive a referral fee ranging from .05% to .10%. This fee shall be due and payable within thirty (30) days after ADVISER received the client advisory fee and shall continue so long as the Solicitor remains eligible and qualified to receive such fees. In consideration for client referrals and other requested or required Solicitor activities, ADVISER shall pay a referral fee as full compensation for services provided hereunder. Such payment shall be made in accordance with any applicable federal or state laws, rules or regulations to which ADVISER and Solicitor are subject. These referral fees will be paid to Solicitor's broker/dealer or registered investment adviser firm.

Acrylic will ensure that the compensated person will be properly registered as a solicitor and follow CCR 260.236(c)(2) requirements.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, Acrylic will be deemed to have custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction from Acrylic and the custodian, and they should carefully review those statements for accuracy. Clients will be advised to compare the statements and/or invoices they receive from custodians to the ones that they receive from Acrylic.

Item 16: Investment Discretion

Acrylic provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Acrylic generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, Acrylic's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to Acrylic).

The firm will be able to place limitations on discretionary authority if their account is being managed by a third-party.

Item 17: Voting Client Securities (Proxy Voting)

Acrylic will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

Acrylic neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither Acrylic nor its management has any financial condition that is likely to reasonably impair Acrylic's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Acrylic has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

Acrylic currently has only one management person: Charles Anthony Truhlar. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

Acrylic does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.

Acrylic Financial, Inc.

Kansas Addendum to Firm Brochure

Disclosure for clients and prospective clients residing in Kansas: Please be advised that the investment advisory firm has professional liability insurance coverage for its investment advisory services. If applicable, a copy of the insurance agreement for the firm's professional liability insurance coverage will be provided to the client upon request.