

Relationship Summary

We are True Freedom Investing, LLC, dba Sherman Portfolios, an investment adviser registered with the Securities and Exchange Commission. Investment advisory and brokerage services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. Our firm and financial professionals' registration information are also publicly available on this website.

What investment services and advice can you provide me?

We offer asset management services as a sub-adviser to third-party investment advisers, who then offer such model strategies to their retail advisory clients. In addition, we will enter into model provider agreements with registered investment advisers and broker-dealers in which we will provide our model portfolios and updates to those who engage the firm for such services. Our portfolio management services are generally offered through third-party investment advisers on either a sub-advised basis or a consulting arrangement as a model provider.

We offer model portfolio strategies as well as advice on exchange-traded funds. Under a sub-advised relationship, we will exercise discretion only with respect to the composition of its model portfolios, which generally means discretion with respect to the nature and type of securities to be purchased and sold, and the amount of securities for such transactions.

We review our model portfolios on at least a monthly basis and perform ad hoc reviews on an as-needed basis if there have been material changes in the client's investment objectives or risk tolerance, or a material change in how we formulate investment advice as part of our standard service.

Our minimum account size is \$5,000 for all model portfolios, which can be waived at our discretion.

Please go to <https://adviserinfo.sec.gov/firm/summary/322728> for additional information on our firm. Select **PART 2 BROCHURES** and reference **Items 4, 7, and 8** of our **Part 2A Brochure** for additional information on our services, investment advice, and account requirements.

Other Questions You May Have

Given my financial situation, should I choose an investment advisory service? Why or why not?

How will you choose investments to recommend to me?

What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

What fees will I pay?

Our quarterly fees are calculated as a percentage of the assets under our management, so our fees will rise and fall with the value of the assets we manage for clients. As a result, we are economically incented to recommend that you place more assets in your account in order to increase the value of your portfolio, because as the value increases, so do our fees.

In addition to our fees, you may be charged transaction or asset-based fees by your custodian for its services. These fees vary depending on the custodian. Under a transaction fee arrangement, the more transactions effected in your account, the more fees you will pay, and high activity in your account does not assure positive portfolio performance. For custodians that charge their fees based upon a percentage of your assets, such fees may be more than would be the case if you are charged a transaction-based fee. Please be mindful of the effect of your portfolio size, the level of activity, and the rate of custodian asset-based pricing. Generally, large portfolios would be disadvantaged by paying an asset-based custodian fee versus a transaction-based fee.

Some securities, such as ETFs, carry additional costs. There are additional fees such as internal fees and expenses charged by mutual funds (i.e., 12b-1 distribution fees and management fees that are assessed within the mutual fund) and exchange-traded funds, third-party separate account manager fees, postage and handling, transfer taxes, SEC fees for sales of securities.

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

You can find more information about our fees and costs under Item 5 of our Part 2A Brochure, available at <https://adviserinfo.sec.gov/firm/summary/322728>.

Other Questions You May Have

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

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

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

- Our financial professionals also provide services to our affiliate, Pinkerton Retirement Specialists, LLC, a registered investment adviser. We have an economic interest in recommending our affiliate for separate account management.
- We may utilize solicitors to solicit business on our behalf. We pay the solicitor a percentage of our fee, and although this does not represent an increase in your fees, it does present a conflict of interest in that the solicitor may be recommending you establish an advisory relationship with us because of the payment we make to the solicitor and not because the solicitor feels that we're the best firm for your needs.

Additional information regarding conflicts of interest can be found in Items 5, 10, 11, and 14 of our Part 2A Brochure, available at <https://adviserinfo.sec.gov/firm/summary/322728>.

Other Questions You May Have

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

How do your financial professionals make money?

Our financial advisors are paid a salary and bonus. These amounts are determined by the overall profitability of the firm, which is dependent upon many factors, including assets under the firm's management. As a result, we are incentivized to recommend that you add additional assets to your account. We do not receive non-cash compensation.

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

No. You can visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research our firm and financial professionals.

Other Questions You May Have

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

You can find additional information about our investment advisory services on our Part 2A Brochure, available at <https://adviserinfo.sec.gov/firm/summary/322728>. You may contact us at 800-634-2008 or via email to matt@truefreedom.com if you have questions or to request a current copy of this Relationship Summary.

Other Questions You May Have

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

Exhibit 1: Form CRS Changes

We have made the following change to our Relationship Summary since the last version issued December 23, 2024: Sherman Portfolios, LLC, changed its name to True Freedom Investing, LLC, dba Sherman Portfolios.