

Mosaic FI LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Mosaic FI LLC. If you have any questions about the contents of this brochure, please contact us at 847-371-5203 or by email at: tammy@mosaicfi.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 Mosaic FI LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Mosaic FI LLC's CRD number is: 169670.

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Registration does not imply a certain level of skill or training.

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Item 2: Material Changes

The material changes in this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure. The last annual updating amendment of Mosaic FI LLC was on 02/07/2024. Material changes relate to Mosaic FI LLC policies, practices or conflicts of interest.

- Tamra R. Wener is now a Partner and Chief Compliance Officer of Mosaic FI LLC. (Items 4, 10, 13 and 19)

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Item 4: Advisory Business

A. Description of the Advisory Firm

Mosaic FI LLC (hereinafter "Mosaic") is a Limited Liability Company organized in the State of Illinois. The firm was formed and registered in November 2013, and the principal owners are Jenifer Ann Aronson and Tamra R. Wener, Chief Compliance Officer.

B. Types of Advisory Services

Mosaic offers the following services to advisory clients:

Portfolio Management Services

Mosaic offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Mosaic 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

Mosaic evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Mosaic seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Mosaic's economic, investment or other financial interests. To meet its fiduciary obligations, Mosaic attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and, accordingly, Mosaic'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 Mosaic's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, that might have a limited supply, among its clients on a fair and equitable basis over time.

Pension Consulting Services

Mosaic offers consulting services to small businesses to create SIMPLE IRA, SEP IRA, and Individual 401(k) plans for their owners and employees.

Financial Planning

Mosaic provides holistic, objective, financial planning services to individuals, families, estates, and trusts. Financial planning is included for all clients engaging Mosaic for portfolio management services and is also offered as a stand-alone service separate from portfolio management.

Mosaic focuses not just on numbers and reports but takes the time to get to know and educate the clients it serves. The topics covered under a financial plan may include, but are not limited to, one or more of the following, as mutually determined by the client and Mosaic:

- o Asset allocation
- o Cash flow planning and management
- o Divorce planning
- o Education funding
- o Elder care planning
- o Estate planning and asset titling
- o Investment manager selection
- o Investment portfolio review
- o Risk/insurance planning
- o Retirement planning
- o Social Security planning
- o Planning for a family member with special needs
- o Stock option/restricted stock planning
- o Tax planning

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

Services Limited to Specific Types of Investments

Mosaic generally limits its investment advice to mutual funds, Exchange Traded Funds (ETFs), fixed income securities, and real estate funds (including REITs). Mosaic may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

Portfolio Management Services

Mosaic will tailor an investment management program for each individual client. Mosaic focuses not just on standard risk tolerance information but on the goals and objectives of each client. We evaluate each client to determine the appropriate asset allocation based on their needs and requirements. This will include an interview session to identify the client's specific needs and requirements as well as a plan that will be executed by Mosaic on behalf of the client. Mosaic may use "model portfolios" 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. However, if the restrictions prevent Mosaic from properly servicing the client account, or if the restrictions would require Mosaic to deviate from its standard suite of services, Mosaic reserves the right to end the relationship.

Financial Planning

Mosaic will tailor a customized financial plan that will include the following:

- 1) Defining Concerns, Goals, and Needs – Mosaic will provide the client with a list of documentation and information to gather, review the information, and engage the client in communication (in person, by phone, and/or via e-mail) regarding concerns, goals, and needs. A material lack of disclosure by the client will impact the advice provided. It is the client's responsibility to notify Mosaic if there is any significant change or new information that will impact the Mosaic's work in providing services to the client.
- 2) Determining the Scope of the Engagement - While Mosaic strongly recommends that the client review all relevant financial planning areas in order to understand their overall financial situation, Mosaic recognizes that there are situations where a client will wish to engage Mosaic for assistance with only limited areas. The client and Mosaic will determine the scope of services to be provided for clients engaging Mosaic for stand-alone financial planning services, Mosaic and the client will enter into a written agreement identifying those services. The client must understand that the entire financial situation may not be fully addressed if only limited areas are to be reviewed within the terms of the agreement.
- 3) Review of Current Financial Picture – Clients will be provided with a written report/summary covering the topics reviewed in the financial plan. For portfolio management clients, and clients engaging Mosaic for comprehensive financial planning as a stand-alone service, the financial plan will review the current situation and may provide alternate scenarios as requested by the client and/or as determined by Mosaic. Clients engaging Mosaic for review of limited areas may receive a report focusing only on the relevant areas and/or a summary of key findings and recommended next steps. The client is responsible for reviewing the report, identifying and

reporting to Mosaic any incorrect information, informing Mosaic of any inaccurate or changed assumptions, and providing any new information that is material to the financial plan.

- 4) Developing Observations and Recommendations - Mosaic will provide observations and recommendations based on the information provided by the client and the work completed by Mosaic. The client will review the observations and recommendations and may choose to accept or reject the advice provided by Mosaic.
- 5) Implementation of Recommendations - Mosaic emphasizes the importance of implementation in achieving the client's financial goals. However, the client will have sole responsibility for deciding which of Mosaic's recommendations to implement and for achieving that implementation, including by engaging accountants, estate planning attorneys, investment firms, insurance agents and/or other professionals as necessary. For clients who engage Mosaic for portfolio management services, Mosaic will assist with the implementation of the recommendations the client chooses to implement, as directed by the client. For clients who engage Mosaic for stand-alone financial planning services, if the client requests Mosaic's assistance with implementation and Mosaic is able and willing to provide that assistance, Mosaic will work together with the client to identify which tasks Mosaic will help implement. Depending on the scope of the implementation, Mosaic may prepare a new engagement letter to cover just the implementation phase of the engagement.
- 6) Monitoring and Updating - As with implementation, Mosaic strongly encourages its clients to monitor their financial plan, including their investment holdings and allocation, on a regular basis, and to update the financial plan periodically to address changing circumstances and goals. For clients who engage Mosaic for portfolio management services, Mosaic will provide regular monitoring and updating of the client's financial plan. For clients who engage Mosaic for stand-alone financial planning services, the client will have sole responsibility for monitoring and updating, and for engaging appropriate professionals to assist them in doing so. Mosaic will not provide monitoring or updating of the client's financial plan, including their investments, unless specifically engaged by the client to do so as identified in the engagement letter. It is at the client's discretion whether to re-engage Mosaic from time to time to update the client's financial plan, review the client's investments, and/or address any new goals, concerns, or significant changes.

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, fund expenses, and any other administrative fees. Mosaic does not participate in any wrap fee programs.

E. Assets Under Management

Mosaic has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 74,204,818.00	\$ 0.00	December 2023

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Services Fees

Total Assets Under Advisement	Annual Fee
Up to 1,000,000	1.00%
\$1,000,000 to \$3,000,000	0.75%
Above \$3,000,000	0.50%

Mosaic bills based on the balance on the first day of the billing period. The fee schedule is a blended tier schedule. Financial planning services are included in the portfolio management fees.

These fees are negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Unless a client has received Mosaic’s disclosure brochure (this Form ADV Part 2A) at least 48 hours prior to signing the Investment Advisory Contract, the client may terminate the advisory relationship within five business days of signing the contract without penalty, for full refund of Mosaic’s fees. Thereafter, clients may terminate the Investment Advisory Contract with one day’s written notice.

Pension Consulting Services Fees

For SIMPLE IRA plans, Mosaic charges a minimum of \$50 per quarter per participant fee, and a maximum \$125 per quarter per participant fee. For SEP IRA and Individual 401(k) plans, the Portfolio Management Service Fees apply.

Financial Planning Fees

Fixed Fees

Fees to develop a comprehensive financial plan start at \$3,500. The actual fee will be determined based on the scope of work and will be documented in the financial planning agreement presented to the client before work begins.

Hourly Fees

For certain projects, Mosaic will bill at an hourly rate. The current hourly rate for financial planning services is \$345. Mosaic bills for all financial planning services at an hourly rate based on actual time spent. This hourly rate will be evaluated annually and likely will increase from year to year. Mosaic will record the time spent each day on our services, to the nearest one-tenth of an hour, and Mosaic bills for reasonable out-of-pocket expenses incurred during the engagement.

B. Payment of Fees

Payment of Portfolio Management Fees

Portfolio management fees are withdrawn directly from the client's accounts with client's written authorization. Fees are paid quarterly.

Payment of Pension Consulting Services Fees

Pension Consulting fees are withdrawn directly from the client's accounts with client's written authorization. Fees are paid quarterly.

Payment of Financial Planning Fees

Fixed fee financial planning fees require a deposit equal to 50% of the fixed fee to start the engagement and the remaining 50% balance will be billed upon completion of the engagement.

For hourly financial planning fees, Mosaic bills monthly in arrears based on the time spent or at the end of a specific project, with invoices due and payable upon receipt. Depending on the engagement scope, Mosaic may require a deposit equal to 50% of the estimated fee in order to start the engagement.

At no time will Mosaic require payment of more than \$500 in fees more than six months in advance of the financial planning engagement.

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 Mosaic. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

Mosaic collects fees in advance. Refunds for fees paid in advance will be returned within fourteen days to the client via check or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee by 365.)

For all financial planning fees paid in advance, if the engagement is terminated by the client within (5) business days of signing the agreement, 100% of the initial deposit will be refunded. For engagements terminated after (5) business days of signing the agreement, the fee refunded will be determined by calculating an estimate of the time spent on the engagement times the current hourly rate and subtracting the calculated amount from the deposit paid at the beginning of the engagement.

E. Outside Compensation For the Sale of Securities to Clients

Neither Mosaic nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

Mosaic 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

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

- ❖ Individuals, families, trusts and estates
- ❖ High-Net-Worth Individuals
- ❖ Corporations or Business Entities
- ❖ Pension and Profit Sharing Plans

Minimum Account Size

For Portfolio Management clients the minimum account balance is \$500,000. Management has the right to make an exception on a case-by-case basis.

For clients engaging Mosaic for stand-alone financial planning services, there is no minimum account/portfolio size and no minimum net worth or income requirement.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Mosaic's methods of analysis include fundamental analysis, technical analysis, cyclical analysis, quantitative 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.

Cyclical analysis involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

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

Investment Strategies

Mosaic 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.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles these investors are trying to exploit.

Quantitative Model Risk. Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Modern Portfolio Theory assumes that investors are risk adverse, 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

Mosaic's use of short term trading generally holds greater risk and clients should be aware that there is a material risk of loss using any of those 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.

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 are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds and Exchange Traded Funds (ETFs): Investing in mutual funds and ETFs carries the risk of capital loss and thus clients may lose money investing in mutual funds and ETFs. All mutual funds and ETFs have costs that lower investment returns. Mutual funds and ETFs can be of a lower risk nature through investments.

Mutual funds and ETFs can hold a variety of different investments. Some mutual funds and ETFs are considered lower risk because they primarily hold bonds (also referred to as fixed income) and some are considered higher risk because they primarily hold stocks (also referred to as equities). For more information about fixed income and equities, see below.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary and 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.

Equities are considered to carry a high level of risk. These risks include, the share price of the stock falls, not receiving the dividends that were expected, the company restructures, or some combination of all of these risks. A slower-growth or recessionary economic environment could also have an adverse effect on the price of all stocks.

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.

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.

Item 10: Other Financial Industry Activities and Affiliations

As a fiduciary, Mosaic has certain legal obligations, including the obligation to act in clients' best interest. Mosaic maintains a Business Continuity and Succession Plan and seeks to avoid a disruption of service to clients in the event of an unforeseen loss of key personnel, due to a disability or death. To that end, Mosaic has entered into a succession agreement with Strategic Wealth Partners Group, LLC, effective September 14, 2017. Mosaic can provide additional information to any current or prospective client upon request to Jenifer A. Aronson, CFA, Managing Partner at (847) 371-5203 or jenifer@mosaicfi.com.

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

Neither Mosaic nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

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

Neither Mosaic 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

Tamra R. Wener and her husband are joint partners in Austin Ventures, LLC, a residential rental business. The business was started in April 2003 and is used to purchase residential real estate and rehab the properties to sell or rent. She spends less than 5 hours per month on this business and none of the hours are spent during securities trading hours. Duties include financial due diligence, legal document review, and accounting.

Tamra R. Wener is an adjunct instructor at Northwestern University School of Professional Studies. When class is in session, she spends 9 hours per month on this activity.

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

Mosaic does not utilize nor select third-party investment advisers. All assets are managed by Mosaic management.

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

A. Code of Ethics

Mosaic 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. Our Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Mosaic may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Mosaic 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. Mosaic 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.

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

From time to time, representatives of Mosaic may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Mosaic 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, Mosaic will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Item 12: Brokerage Practices

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

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

that state in which the client resides. Mosaic recommends Charles Schwab & Co., Inc. ("Schwab") Member FINRA/SIPC.

1. Research and Other Soft-Dollar Benefits

While Mosaic has no formal soft dollars program in which soft dollars are used to pay for third party services, Mosaic may receive research, products, or other services from its broker/dealer in connection with client securities transactions ("soft dollar benefits") consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended, and may consider these benefits in recommending brokers. There can be no assurance that any particular client will benefit from any particular soft dollar research or other benefits. Mosaic benefits by not having to produce or pay for the research, products or services, and Mosaic will have an incentive to recommend a broker dealer based on receiving research or services. Clients should be aware that Mosaic's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

Mosaic 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

Mosaic will require clients to use a specific broker-dealer to execute transactions.

B. Aggregating (Block) Trading for Multiple Client Accounts

If Mosaic buys or sells the same securities on behalf of more than one client, it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple Clients in order to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, Mosaic 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. Mosaic would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with the Adviser's duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Reviews of Accounts

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

All client portfolio management accounts are reviewed at least monthly only by Tamra R Wener, Partner and Chief Compliance Officer, 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 Tamra R Wener, Partner and Chief Compliance Officer. There is only one level of review for financial plans, and that is the total review conducted to create the financial plan.

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

Portfolio management 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, Mosaic's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each portfolio management client will receive at least quarterly a written report that details the client's account including assets held and asset value, which report will come from the custodian and at least quarterly a written report from Mosaic.

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)

Mosaic participates in the institutional advisor program (the "Program") offered by Schwab. Schwab offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. Mosaic receives some benefits from Schwab through its participation in the Program.

As part of the Program, Mosaic may recommend Schwab to clients for custody and brokerage services. There is no direct link between Mosaic's participation in the Program and the investment advice it gives to its clients, although Mosaic receives economic benefits through its participation in the Program that are typically not available to Schwab retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Mosaic participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have Mosaic's fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Mosaic by third party vendors. Schwab may also pay for business consulting and professional services received by Mosaic's related persons. Some of the products and services made available by Schwab through the Program may benefit Mosaic but may not benefit its client accounts. These products or services may assist Mosaic in managing and administering client accounts, including accounts not maintained at Schwab. Other services made available by Schwab are intended to help Mosaic manage and further develop its business enterprise. The benefits received by Mosaic or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to Schwab. As part of its fiduciary duties to clients, Mosaic endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Mosaic or its related persons in

and of itself creates a conflict of interest and may indirectly influence Mosaic's choice of Schwab for custody and brokerage services.

B. Compensation to Non - Advisory Personnel for Client Referrals

Mosaic does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When it deducts fees directly from client accounts at a selected custodian, Mosaic will be deemed to have limited 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, and they should carefully review those statements for accuracy.

When advisory fees are deducted directly from client accounts at client's custodian, Mosaic will be deemed to have limited custody of client's assets. Because client fees will be withdrawn directly from client accounts, in states that require it, Mosaic will:

- A. Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- B. Send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client.
- C. Send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Clients are urged to compare the account statements they received from custodian with those they received from Mosaic.

Item 16: Investment Discretion

Mosaic provides discretionary investment advisory services to clients. The Investment Advisory Contract established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, Mosaic generally manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share. In some instances, Mosaic'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 Mosaic).

Item 17: Voting Client Securities (Proxy Voting)

Mosaic 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

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

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

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

C. Bankruptcy Petitions in Previous Ten Years

Mosaic 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

The education and business background of Mosaic's current management persons/executive officers, Jennifer Ann Aronson and Tamra R Wener, 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. How Performance-based Fees are Calculated and Degree of Risk to Clients

Mosaic 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

Neither Mosaic nor any Mosaic management has been found liable in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

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

See Item 10.C and 11.B.