

Form ADV, Part 2A: Firm Brochure  
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## **Tomasetti Investment Group, LLC**

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**This brochure provides information about the qualifications and business practices of Tomasetti Investment Group, LLC. If you have any questions about the contents of this brochure, please contact us at 617-454-1200 or email us at [admin@tomasettigroup.com](mailto:admin@tomasettigroup.com).**

**Additional information about our firm, Tomasetti Investment Group, LLC, also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**This brochure has been provided to you as required by the Securities Division of the Secretary of State's Office of Commonwealth of Massachusetts. This brochure has not been approved or verified by any governmental authority, including the United States Securities and Exchange Commission, or by any state securities authority. Registration of a registered investment adviser does not imply any level of skill or training. The Massachusetts Securities Division requires that all investment advisers inform their clients that: clients may telephone the Massachusetts Securities Division (617- 727-3548) to obtain the disciplinary history of an investment adviser and its representatives.**

### Material Changes

Below is a discussion of any material changes to our business, as of our last annual update, on September 8, 2023.

**THERE HAVE BEEN NO MATERIAL CHANGES SINCE OUR LAST UPDATE.**

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## Advisory Business

Tomasetti Investment Group, LLC (TIG), founded in 2006 by David F. Tomasetti, the firm's owner, is a Massachusetts Registered Investment Advisor and financial planning firm that provides individuals and families with comprehensive wealth management services. TIG engages in Investment Supervisory Services and Financial Planning Services.

### Investment Supervisory Services:

TIG's principal service is providing fee-based Investment Supervisory Services. TIG practices custom management of investment portfolios, on a discretionary and non-discretionary basis, according to the client's objectives and risk tolerance.

The advisor's primary approach is to use an asset allocation strategy with an index and/or value approach to selecting investments. We begin by establishing a long-term investment strategy, taking into account your individual circumstances and investment objectives. The essentials of your strategy will include the need for current income, specific growth objective, ability and willingness to take on risk, and your expectation of future principal and/or income needs. Our objective is to manage capital toward the clients' goal in broadly diversified portfolios to help minimize portfolio risk and preserve principal.

Clients of TIG may impose restrictions on what types of securities the client will invest in. For example, if a client is morally opposed to investing in shares of tobacco companies, that client may request that his or her account not be invested in such manner.

TIG will manage assets for clients, in this customized way, on both a discretionary and a non-discretionary basis.

As of the date of this brochure, TIG managed \$44,421,420 on a discretionary basis and \$0 on a non-discretionary basis.

### Financial Planning Services:

In addition to Investment Supervisory Services, TIG engages in Financial Planning Services for some of its clients. TIG's Financial Planning services include a detailed needs analysis of the clients' financial well-being and custom management of portfolios based on its clients' investment objectives, goals and financial situations. It may also include providing investment strategies and general or tailored investment advice. Clients can request all types of Financial Planning services. When engaging in Financial Planning services, most clients will pay no additional fees, other than the investment management fees that are normally charged for Investment Supervisory Services. Clients with smaller Investment Supervisory Accounts or clients with Financial Planning projects that require significant time, may be assessed additional fees for Financial Planning services. If so, the type of Financial Planning services provided and the fees to be charged will be contracted by TIG and the client prior to establishing a Financial Planning engagement.

## Fees and Compensation

TIG intends to be compensated for its investment supervisory services by charging fees for the assets under management and/or through hourly fees.

### Investment Supervisory Services:

TIG charges a fee quarterly, in arrears, for Investment Supervisory Services provided by Tomasetti Investment Group, LLC pursuant to an advisory agreement. The fee is calculated based on the beginning balance for the period plus contributions and minus distributions from the account during the period. The client understands to the extent that the assets are allocated to investment company shares, certain costs may be associated with the ownership of such shares as described in each prospectus. Certain services of the custodian may require the client to pay cost in addition to the advisory fee paid to the advisor, for example commissions on the purchase and/or sale of securities. Client accounts are charged the below-referenced fees in accordance with the portfolio increment, and that fees on all accounts may be negotiated without regard to account size. The standard fee schedule is as follows:

<u>Portfolio Increment</u>	<u>Annual Client Fee</u>
\$0 - \$999,999	1.50%
\$1,000,000- \$1,999,999	1.00%
\$2,000,000- \$3,999,000	0.75%
\$4,000,000+	0.60%

The advisor fee will be charged directly against the client's account when due, or some other account held by the custodian owned by the client established in part to pay advisory fees. TIG determines the fee due and instructs the custodian to apply the annual fee charge specified by this agreement. The advisor will advise the client of the fee, the fair market value of the account, and how the fee was calculated. The method to attain the fee is: the custodian will debit the client's account and credit the advisor's account. It is the client's responsibility to verify the calculation of the fee.

Clients may request to terminate their advisory contract with TIG in whole or in part, by giving thirty days' advance written notice. Upon termination, any fees owed to TIG will be prorated to the date of termination.

### Hourly Fees & Fixed Fees:

In addition to the portfolio management fee schedule above, TIG charges fees by the hour and/or per engagement for Financial Planning Services. This fee will be disclosed in an engagement letter, to be signed by the client, before all work is to begin. For clients with asset management accounts, this fee may be waived – based on the size of the account.

### Performance Fees and Side-by-Side Management

TIG and its principles are not engaged in any business activities that involve performance fees.

### Types of Clients

TIG provides financial planning advice and asset management services to individuals, trusts, and company profit sharing plans.

TIG requires a client to have a minimum of \$750,000.00 in investable assets. However, based on prior relationships and other negotiable circumstances, TIG may accept accounts with a lower value.

### Methods of Analysis, Investment Strategies and Risk of Loss

TIG uses various security analysis methods including but not limited to, Fundamental, Technical, Cyclical, and Charting. This information is derived from financial newspapers and magazines, television, websites, research materials prepared by other investment firms, corporate rating services, mutual fund rating services, annual reports, annual reports, prospectuses, filings with the Securities and Exchange Commission and company press releases.

This information is used in making investment decisions for client accounts with the intent of long-term investments (held more than one year), short-term investments (sold within a year), trading (securities sold within thirty days), short sales, margin transactions, and option writing, including covered options and uncovered options, but only if the client's risk profile warrants.

**Investing in any security involves the risk of loss. Clients should be prepared to bear this risk before investing (see Risk of Loss below).**

Generally, advisory accounts managed by TIG will comprise of a diversified group of securities and investment classes that includes, but is not limited to stocks, bonds, mutual funds, ETF's, CD's and money market funds. Portfolios are developed in accordance with client wishes and based on their individual risk tolerance, as discussed with the principle of TIG before any money is invested. The allocation as to how much of each of the various investment classes is contained within a portfolio is determined by the client's risk tolerance, age and personal wishes. For example, a client may have 50% of its portfolio invested in stocks and 50% of its portfolio invested in bonds. Another client with a lower risk tolerance may have 40% of its portfolio in stocks and 60% of its portfolio in bonds.

#### **Risk of Loss**

Any investment in securities entails risks of loss that clients should be prepared to bear. While TIG will use its best judgment and good faith efforts in rendering services to its clients, not every investment recommendation made by us will be profitable. We cannot warrant or guarantee any specific level of performance, or that any investment will be profitable over time. **The client assumes all market risk and understands that investment decisions are subject to various market, currency, economic, political, and business risks.**

These risks apply equally to stocks, bonds, commodities and any other investment or security. Some Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Advisor's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

**Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

**Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse



developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes and may be callable.

**Inflation:** Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Exchange Traded Fund prices may vary significantly from the Net Asset Value due to market conditions. ETFs carry the risk of capital loss. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

**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. Funds can be of bond "fixed income" nature (lower risk) or common stock "equity" nature (mentioned above).

### Disciplinary Information

There have been no disciplinary actions taken against TIG and/or its President, David F. Tomasetti.

Disciplinary history of the investment advisor and its representatives can be obtained from the Massachusetts Securities Division.

#### Other Financial Industry Activities and Affiliations

TIG has no other Financial Activities and/or Affiliations other than its primary business.

David F. Tomasetti, the President of TIG, is a Massachusetts Licensed Insurance Producer. Mr. Tomasetti recommends and sells insurance as an adjunct to his regular duties working for clients at TIG.

Mr. Tomasetti's Massachusetts Insurance Producer License number is: 1826599

### Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

#### Code of Ethics:

TIG maintains a professional code of ethics. This code of ethics is documented in our office. TIG will provide a copy of the code to any client or prospective client upon request.

#### Participation or Interest in Client Transactions:

No potential conflict to report.

#### Personal Trading:

TIG and/or David F. Tomasetti may buy and/or sell securities, for its/his own benefit, which it/he recommends to clients.

At times, the interests of TIG and/or David F. Tomasetti's personal investment accounts may coincide with the interests of clients' accounts; however, at no time will TIG and/or David F. Tomasetti receive an added benefit or advantage over clients with respect to these transactions. The interests of clients are always put ahead of TIG and/or David F. Tomasetti. In each trading instance, the interests of advisory clients are placed first. TIG and/or David F. Tomasetti will generally be "last in" or "last out" in any security position that is traded when clients are involved in that particular trade. TIG and/or David F. Tomasetti will prepare a record of firm and/or personal securities transactions at a client's request.

## Brokerage Practices

### Brokerage Discretion:

TIG will inform its clients, in clear and understandable language, that they will have discretion to select the broker or dealer for custodial and execution services. In addition, TIG will disclose the following information as it relates to the relationship between the broker/dealer, TIG and the client: (1) TIG will not dictate commissions, and (2) TIG does not receive any type of product, service, compensation or research from the chosen broker/dealer. TIG will choose the broker/dealer to be used based on execution and custodial services offered, cost, quality of service and their reputation based on prior business dealings.

### Broker Recommendations:

TIG is not affiliated with any broker.

TIG receives no compensation of any kind from any broker, regardless of whether a client uses that broker. Currently, all client assets are housed at Charles Schwab & Co., Inc. However, clients may choose any broker or combination of brokers they wish to custody their assets. If requested by the client, TIG may suggest brokers for the client to use. There will be no pressure to use the recommended broker and no extra fee or cost associated with the client using a broker not recommended by TIG. TIG may recommend brokers based on criteria such as, but not limited to, reasonableness of commissions charged to the client, internet services made available to the client, and location of broker offices.

In the event that a client directs TIG to use a particular broker or dealer, it should be understood that under those circumstances, TIG will not have the authority to negotiate commissions, obtain volume discounts and best execution may not be achieved. In addition, under these circumstances, a disparity in commission charges may exist between the commissions charged to other clients.

### Review of Accounts

David F. Tomasetti, president of TIG, will oversee day to day activity in all accounts managed. David F. Tomasetti performs reviews of accounts on an ongoing basis without a specific time frame, but all accounts have been reviewed at least monthly.

Accounts will be mailed a quarterly statement of performance, from TIG, in addition to their regular monthly statements and confirmations distributed by the broker dealer handling the client accounts.

#### Review of your account statements:

Clients should review statements from TIG and compare them routinely with statements that come from the custodian or broker dealer. If there is a discrepancy, the client should inform TIG as soon as possible.

#### Client Referrals and Other Compensation

TIG does not pay for, nor does it accept, payments from others for client referrals.

There are no conflicts of interest from third party transactions to report.

### Custody

TIG does not take custody of client funds. All client assets are held at an independent custodian.

TIG does deduct its management fees from client accounts. Prior to doing so, TIG will receive written authorization from the client to deduct advisory fees from the account held with the qualified custodian (Permission is contained in both the Investment Advisor Contract and the Custodians account application. Before a fee is directly deducted from a client account, TIG will (1) send the qualified custodian an instruction of the amount of the fee to be deducted from the client's account; and (2) send the client an invoice or statement itemizing the fee. Itemization includes the management fee rate used to calculate the fee and the time period covered by the fee. All of TIG's clients receive account statements directly from qualified custodians that maintain those assets. The client should carefully review these account statements and compare them to the quarterly or other reports provided by TIG. TIG urges all of our clients to reconcile their statements in order to ensure that all transactions, including deductions to pay advisory fees, are correct.

In keeping with our practice of not having custody of our clients' assets, we:

- Prohibit our firm and employees from acting as trustee for, or having full power of attorney over, a client account.
- Do not accept client securities (e.g., stock certificates) or funds delivered to us.
- Do not collect fees of \$500 or more, per client, for services to be performed six months or more in advance.
- Do not authorize any employee to have knowledge of a client's account access information (e.g., passwords for online 401(K), brokerage or bank accounts), even for the convenience or accommodation of the client or their legal agent.



## Investment Discretion

### Investment Discretion:

Generally, clients grant TIG complete discretion over the selection and amount of securities to be brought or sold for their account (within the parameters established by their Advisory Agreement) without obtaining their consent or approval. However, these purchases may be subject to specified investment objectives and guidelines. For example, a client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio.

Discretionary authority will only be authorized upon full disclosure to the client and by that client specifically authorizing said authority through the execution of an Investment Advisory Agreement. All discretionary trades made by TIG on behalf of its discretionary accounts (clients) will be in accordance with that client's investment objectives and goals.

Our primary objective in placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality, and 5) skill required of the broker. TIG will execute its transactions through an unaffiliated broker-dealer. Currently, TIG uses Charles Schwab & Co., Inc for all its transactions. TIG uses Charles Schwab's Investment Advisor's platform. The broker-dealer was chosen because it offers an investment advisor platform that is competitive with other platforms offered based on the following: 1) the broker's capital depth, 2) the broker's market access, 3) the broker's transaction confirmation and account statement practices, 4) clearance and settlement capabilities of the broker selected and others considered, and 5) the reasonableness of the commission or its equivalent for the specific transaction. If we trade away from Charles Schwab, we will not necessarily pay the lowest commission or commission equivalent. Transactions may involve specialized services on the part of the broker. This would justify higher commissions (or their equivalent) than other transactions requiring routine services.

TIG may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trades cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular client accounts. For example, a partial fill will generally be filled pro-rata among participating accounts. Prior to entry of a block trade, a written pre-allocation will be generated, which identifies the group of client accounts participating in the order.

Changes in allocation prior to final allocation may be made for good cause provided that all client accounts receive fair and equitable treatment. A written explanation of the reason for any material change in the allocation must be provided to and approved by the Compliance Officer (David F. Tomasetti) no later than the morning following the execution of the trade. If the change in the allocation is the result of a condition that exists or a change in the client's account outside of the portfolio manager's control, then approval by the Compliance Officer (David F. Tomasetti) is not required.

### Voting Client Securities

As a general rule, TIG does not vote proxies.

With some exception, TIG will vote proxies on behalf of clients.

As a general rule, all proxy materials received on behalf of a client account are to be sent directly to the client or to a designated representative of the client, who is responsible for voting the proxy. TIG personnel may answer client questions regarding proxy voting matters in an effort to assist the client in determining how to vote the proxy. However, the final decision of how to vote the proxy rests with the client.

**More often than not now, clients are choosing to have limited mail sent to them, and/or would rather have TIG in more control of their investments. In such situations, TIG has agreed to take the right to vote proxies for those clients. However, TIG rarely votes on those proxies.**

TIG may encounter a material conflict in voting client proxies. The President, David F. Tomasetti, has a duty to recognize a material conflict and to resolve the conflict before voting the proxy. For purposes of this policy, *material* conflicts of interest are defined as those conflicts that, in the opinion of the President, David F. Tomasetti, a reasonable investor would view as important in making a decision regarding how to vote a proxy.

An example of *material* conflict might include:

- (1) A TIG employee has a business or personal relationship (such as a close friend or spouse) with a member of executive management, a participant in the proxy contest, or a corporate director of the company.

Unless a client requests otherwise, TIG will take one of the following actions to ensure the proxy voting decision is based on the client's best interests and is not a result of the conflict:

- (1) Engage an independent party to determine how to vote the proxy;
- (2) Vote in proportion to other shareholders;
- (3) Refer the proxy to a client or to a representative of the client for voting purposes; or
- (4) Disclose the conflict to the affected clients and seek their consent to vote the proxy prior to casting the vote.

In the business history of TIG, there has not been a proxy voting conflict.

A client may request TIG deliver its Proxy Voting Policy, as well as a record of how it has voted that client's proxies.

TIG strives to vote all proxies in the best economic interests of its clients. The decision of how to vote follows the same criteria TIG uses in managing client accounts: to vote for proposals in such a manner that, in TIG's opinion, will increase shareholder value.

TIG will generally support management's recommendations on proxy issues, because management's ability is a key factor that TIG considers in selecting equity securities for client portfolios. TIG believes a company's management should generally have the latitude to make decisions related to the company's business operations. However, when TIG believes the company's management is acting in an inconsistent manner with its clients' best interests, it will vote against management's recommendations.

Financial Information

**Nothing to report since our last annual update**

## Requirements for State-Registered Advisors

### Principle Officers and Management Persons:

#### David F. Tomasetti:

David F. Tomasetti, CFP®, spent 16 years managing the Tomasetti Investment Limited Partnership, a hedge fund that he founded in 1993. The fund's investors included high net worth individuals, partnerships and corporations.

Mr. Tomasetti's primary duties have included all aspects of fund management, including research, investment strategy and execution, reporting and risk management.

Currently, Mr. Tomasetti is a Wealth Manager for TIG, which was founded in 2005. TIG's mission is to help its clients manage their retirement assets and provide Personal Financial Planning.

Mr. Tomasetti is a graduate of Babson College.

Mr. Tomasetti is a Certified Financial Planner, Professional.

#### Other Business Activities of David F. Tomasetti:

David F. Tomasetti is a Massachusetts licensed insurance producer. Mr. Tomasetti only uses his insurance license as an adjunct to the Financial Planning Process at TIG. Less than 5% of his time is spent in this area.

## Information Security and Privacy Policy

**Information Security** To protect our clients' personal information from unauthorized access and use, Tomasetti Investment Group uses security measures that are consistent with best practices and compliant with state and federal laws. These measures include computer safeguards such as firewalls, authentication methods, and encryption of data, as well as secured files. Written personal information is digitized, secured, and shredded when feasible, or is physically secured otherwise. All personal information, when stored digitally, is secured by industry-standard encryption and/or password protected, whether online ("in the cloud"), or on our office computers. Thus, even if our computers were stolen, and our operating-system passwords compromised, all client data would remain fully inaccessible.

### **Privacy Policy**

TIG is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. The types of personal information we collect depends on the scope of the work we perform for you. This information can include:

- Your name, contact information, birth date, and Social Security number.
- Your employment status and investment objectives and experience.
- Your assets, liabilities, income, and expenses.
- Other non-financial information such as your health history or current medical condition.

We use this information to help you meet your personal financial goals.

Under Massachusetts law, clients must "opt-in" to share non-public personal information with nonaffiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. If you give that permission, you may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time in writing. We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with any unaffiliated third parties that require access to personal information, such as financial service companies, consultants, technology providers, and auditors. Federal and state securities regulators may require reviews of our Company records, including your personal information, as permitted by law. Personal identifiable information about you will be maintained while you are a client, and for the period thereafter that retention is required by federal and state securities laws. After that time, that information will be destroyed.