

Item 1: Cover Page



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Form ADV Part 2A – Firm Brochure

Dated: September 10, 2025

This Brochure provides information about the qualifications and business practices of Toole Financial, LLC. If you have any questions about the contents of this Brochure, please contact us at (347) 880-0468 and/or info@toolefinancial.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.

Toole Financial, LLC is a registered investment adviser. Registration does not imply a certain level of skill or training.

Additional information about Toole Financial, LLC also is available on the SEC's website at www.adviserinfo.sec.gov, which can be found using the firm's identification number, 333200.

Item 2: Material Changes

Added/adjusted language to Item 4: Advisory Business to clarify that the service Ongoing Financial Planning is only for Clients who first complete Project-Based Financial Planning with Toole Financial, LLC as well as adding non-advisory services to Item 4 and Item 5: Fees and Compensation based on updated ADV per California registration.

Added/adjusted language to Item 4: Non-Advisory Services to reflect full scope of services. Added/adjusted language to Item 5: To reflect change to billing for all services monthly in arrears; Non-Advisory Financial Education Services to expand and reflect broad range of fees.

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Item 4: Advisory Business

Description of Advisory Firm

Toole Financial, LLC is an Investment Adviser principally located in the state of Massachusetts. We are a limited liability company founded in September 2024. Toole Financial, LLC became registered in 2025. Edward Toole is the principal owner and Chief Compliance Officer (“CCO”).

As used in this brochure, the words “TF”, “we”, “our firm”, “Advisor” and “us” refer to Toole Financial, LLC and the words “you”, “your” and “Client” refer to you as either a client or prospective client of our firm.

Types of Advisory Services

TF is a fee-only firm, meaning the only compensation we receive is from our Clients for our services. From time to time, TF recommends third-party professionals such as attorneys, accountants, tax advisors, insurance agents, or other financial professionals. Clients are never obligated to utilize any third-party professional we recommend. TF is not affiliated with nor does TF receive any compensation from third-party professionals we may recommend.

Financial Planning Services

Financial planning involves an evaluation of a Client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client.

The Client and TF will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for Clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to children and grandchildren (if appropriate).
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.
- **Financial Goals:** We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet Clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

Financial Planning Services are offered on a Project-Based and/or via an Ongoing engagement.

Project-Based Financial Planning. We provide project-based financial planning services on a limited scope, one-time engagement. Project-Based Financial Planning is available for Clients looking to address specific questions or issues. The Client may choose from one or more of the above topics to cover or

other areas as requested and agreed to by TF. Upon engaging the firm for financial planning, TF is responsible for obtaining and analyzing all necessary qualitative and quantitative information from the Client that is essential to understanding the Client's personal and financial circumstances; helping the Client identify, select, and prioritize certain financial goals while understanding the effect that pursuing one goal may have on other potential goals; assessing the Client's current course of action and alternative courses of action to identify required changes that provide the best opportunity for the client to meet their financial goals; and developing & presenting financial planning recommendations based on the aforementioned actions while including all information that was required to be considered in preparing the recommendations. These components all require in-depth communication with the Client in order for the planner to establish a financial plan and implementation strategy that provides the Client with the most appropriate options in pursuing their established goals and objectives. For Project-Based Financial Planning, the Client will be ultimately responsible for the implementation of any recommendations. In cases where the Client requests advice on a single issue but financial planning is required, TF will explain how financial planning will benefit the client and how not providing financial planning may limit the advice. If the client elects not to engage in financial planning, a written summary will be provided but no recommendation given.

Ongoing Financial Planning. This service involves working one-on-one with a financial planner ("planner") over an extended period of time and is only for Clients whose Project-Based Financial Planning engagement with Toole Financial is complete. Through this ongoing arrangement, Clients continue their responsibility for the implementation of the recommendations of their financial plan (the "plan"). The planner will monitor the plan, recommend any appropriate changes and ensure the plan is up-to-date as the Client's situation, goals, and objectives evolve. Clients purchasing this service will receive an updated, written report no less than annually.

CCR Section 260.235.2 Disclosure

For Clients who receive our Financial Planning services, we must state when a conflict exists between the interests of our firm and the interests of our Client. The Client is under no obligation to act upon our recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through our firm.

Client Tailored Services and Client Imposed Restrictions

We tailor the delivery of our services to meet the individual needs of our Clients. We consult with Clients initially and on an ongoing basis, through the duration of their engagement with us, to determine risk tolerance, time horizon and other factors that may impact the Clients' investment and/or planning needs.

Clients are able to specify, within reason, any restrictions they would like to place as it pertains to individual securities and/or sectors that will be advised on or recommended. All such requests must be provided to TF in writing. TF will notify Clients if they are unable to accommodate any requests.

Wrap Fee Programs

We do not participate in wrap fee programs.

Assets Under Management

TF does not manage Client's assets.

Non-Advisory Financial Education Services

TF also provides financial wellness programs and education through educational webinars, articles and speaking engagements for an additional fee to organizations. These are non-advisory services and do not include advice to investors on the value, purchase, or sale of securities.

Item 5: Fees and Compensation

Please note, unless a Client has received this brochure at least 48 hours prior to signing an Advisory Contract, the Advisory Contract may be terminated by the Client within five (5) business days of signing the Advisory Contract without penalty or incurring any fees.

How we are paid depends on the type of advisory services we perform. Below is a brief description of our fees, however, you should review your executed Advisory Contract for more detailed information regarding the exact fees you will be paying. No increase to the agreed-upon advisory fees outlined in the Advisory Contract shall occur without prior Client consent. Please note, lower fees for comparable services may be available from other sources.

Project-Based Financial Planning

We charge an hourly fee for Project-Based Financial Planning. Our hourly rate is \$200. Fees are negotiable and the final agreed upon fee will be outlined in your Advisory Contract. TF bills in arrears at the end of each month with any outstanding balance due upon completion. TF will not bill an amount above \$500 more than 6 months or more in advance of rendering the services.

Ongoing Financial Planning

We charge a recurring fixed fee for Ongoing Financial Planning. The fee is \$100 per month, paid in arrears and beginning the month after the completion of Project-Based Financial Planning. Fees are negotiable and the final agreed upon fee will be outlined in your Advisory Contract.

Non-Advisory Financial Education Services

We charge organizations a fixed fee for one-time seminars, both virtual and in-person. Our hourly rate for one-time virtual presentations is \$200 for presentation preparation and delivery. Our fee for in-person seminars is \$200 an hour for presentation preparation plus \$600 a day, including any travel days, plus related expenses agreed to in advance. Our fee for a monthly virtual webinar series or a comprehensive financial education program is negotiable and can range from \$100–\$7500 depending on the scope of services. All fees are billed monthly in arrears for services rendered.

Fee Payment

For Financial Planning services, fees are paid by electronic funds transfer (EFT). We use an independent third party payment processor in which the Client can securely input their banking information and pay their fee. We do not have access to the Client's banking information at any time. The Client will be provided with their own secure portal in order to make payments.

Other Types of Fees and Expenses

When implementing an investment recommendation, the Client may incur additional fees such as brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by broker-dealers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer

taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Clients may incur fees from third-party professionals such as accountants and attorneys that TF may recommend, upon Client request. Such fees are separate and distinct from TF's advisory fees.

Terminations and Refunds

For Project-Based Financial Planning services, this service is not an ongoing engagement, thus upon receipt of the final fees, the Advisory Contract will automatically be terminated. Clients may terminate at any time provided written notice. If fees are paid in advance, a prorated refund will be given, if applicable, upon termination of the Advisory Contract for any unearned fee. For fees paid in arrears, Client shall be charged a pro-rata fee based upon the number of hours of work completed by the Advisor up to the date of termination.

For Ongoing Financial Planning services, the Advisory Contract may be terminated with written notice 30 calendar days in advance as disclosed in the Advisory Contract. Upon termination, the final month's fee, if applicable, will be prorated based upon the number of days in the billing period.

Sale of Securities or Other Investment Products

Advisor and its supervised persons do not accept 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

We do not offer performance-based fees and do not engage in side-by-side management.

Item 7: Types of Clients

We provide financial planning services to individuals, high net-worth individuals, and charitable organizations. TF has no assets under management and therefore has no requirements for opening or maintaining an account with the firm.

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

Below is a brief description of our methods of analysis and primary investment strategies when we provide securities recommendations in the context of a financial plan.

Methods of Analysis

Modern Portfolio Theory (MPT)

The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

Mutual Fund and/or ETF Analysis: We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the Client's portfolio.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable for the Client's portfolio.

Investment Strategies

Asset Allocation

In recommending our Clients' investment strategy, we begin by attempting to identify an appropriate ratio of equities, fixed income, and cash (i.e. "asset allocation") suitable to the Client's investment goals and risk tolerance.

A risk of asset allocation is that the Client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of equities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the Client's goals. model.

Passive Investment Management

Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are recommended for the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark.

Material Risks Involved

TF does not provide investment management, however investment recommendations may be made as part of the financial planning services. **All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. 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 Adviser's investment strategies and/or investment techniques may not work as intended.

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. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

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

Risks Associated with Securities

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.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Exchange Traded Funds (ETFs) prices may vary significantly from the Net Asset Value due to market conditions. Certain exchange traded funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above (premium) or below (discount) their net asset value and an ETF purchased at a premium may ultimately be sold at a discount; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large

decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Mutual Funds When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Item 9: Disciplinary Information

Criminal or Civil Actions

TF and its management persons have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

TF and its management persons have not been involved in any administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

TF and its management persons have not been involved in any self-regulatory organization (SRO) proceedings.

Clients can obtain the disciplinary history of Toole Financial, LLC or any of its representatives from the Massachusetts Securities Division upon request by calling (617) 727-3548.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

Neither TF or its management persons is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Other Affiliations

Neither TF or its management persons is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

Related Persons

Neither TF or its management persons have any relationship or arrangement with any outside financial industry related parties.

TF also provides financial education seminars and speaking engagements for an additional fee. These are non-advisory services and do not include advice to investors on the value, purchase, or sale of securities.

Recommendations or Selections of Other Investment Advisers

TF does not recommend or select other investment advisers for our clients.

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

As a fiduciary, our firm has a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Code of Ethics Description

This Code of Ethics does not attempt to identify all possible conflicts of interest, and compliance with each of its specific provisions will not shield our firm or its access persons from liability for misconduct that violates a fiduciary duty to our Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Access persons shall offer and provide professional services with integrity.
- Objectivity - Access persons shall be objective in providing professional services to Clients.
- Competence - Access persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Access persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Access persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Access persons conduct in all matters shall reflect the credit of the profession.
- Diligence - Access persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its access persons, or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, principal transaction, among others.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

In order to mitigate any conflicts of interest neither the firm or its related persons buys or sells the same securities we recommend to clients.

Trading Securities At/Around the Same Time as Client's Securities

Neither our firm or its related persons buys or sells securities for client accounts at or about the same time that we or a related person buys or sells the same securities for our own accounts.

Item 12: Brokerage Practices

Factors Used to Select Custodians

TF does not have any affiliation with any custodian.

Research and Other Soft-Dollar Benefits

We do not have any soft-dollar arrangements with custodians.

Brokerage for Client Referrals

We receive no referrals from a custodian, broker-dealer or third party in exchange for using that custodian, broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

As a fee-only financial planner who does not offer Investment Management Services, we do not have a concern over which custodians a Client may choose in order to implement our investment recommendations.

Aggregating (Block) Trading for Multiple Client Accounts

Some investment advisers execute Client accounts on an aggregated basis as a way to lower expenses. As a fee-only financial planner who does not offer Investment Management Services, we do not execute trades on behalf of Clients. As a result, it is up to the Client to negotiate their own trading costs with their custodian.

Item 13: Review of Accounts

Periodic Reviews

Edward Toole, Owner/Member and CCO of TF, will work with Clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. TF does not provide specific reports to Clients, other than financial plans.

Triggers of Reviews

Events that may trigger a special review of a financial plan would primarily include any material changes to the client's financial situation that impacts one or more components of their financial plan.

Item 14: Client Referrals and Other Compensation

Compensation Received by Toole Financial, LLC

TF is a fee-only firm that is compensated solely by its Clients. TF does not receive commissions or other sales-related compensation. We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients.

Client Referrals from Solicitors

TF does not, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

Item 15: Custody

TF does not accept custody of Client funds.

Item 16: Investment Discretion

We do not provide Investment Management Services, and therefore do not exercise discretion.

Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client has any questions on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our Clients, nor have we been the subject of any bankruptcy proceeding. We do not have custody of Client funds or securities, except as disclosed in Item 15 above, or require or solicit prepayment of more than \$500 in fees six months or more in advance.

Item 19: Requirements for State-Registered Advisers

Principal Officers

Edward Toole serves as TF's sole principal and CCO. Information about Edward Toole's education, business background, and outside business activities can be found in his ADV Part 2B, Brochure Supplement attached to this Brochure.

Outside Business

All outside business information, if applicable, of TF is disclosed in Item 10 of this Brochure.

Performance-Based Fees

Neither TF or Edward Toole is compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at TF has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

TF nor Edward Toole have any relationship or arrangement with issuers of securities.

Business Continuity Plan

TF maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including the death of the investment adviser or any of its representatives.

Disclosure of Material Conflicts

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding TF, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Item 1: Cover Page



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toolefinancial.com

Form ADV Part 2B – Brochure Supplement

Dated: March 5, 2025

For

Edward Toole

Owner/Member and Chief Compliance Officer

This brochure supplement provides information about Edward Toole that supplements the Toole Financial, LLC (“TF”) brochure. You should have received a copy of that brochure. Please contact Edward Toole if you did not receive TF’s brochure or if you have any questions about the contents of this supplement.

Additional information about Edward Toole is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 7988354.

Item 2: Educational Background and Business Experience

Edward Toole

Born: 1969

Educational Background

- 2006 – MBA, University of Massachusetts, Amherst
- 1992 – BA, Fairfield University

Business Experience

- 09/2024 – Present, Toole Financial, LLC, Owner/Member and CCO
- 06/2015 – 01/2025, YMCA Retirement Fund, Senior Director of Education & Y Relations
- 07/2010 – 05/2015, YMCA of the USA, Resource Director

Professional Designation(s)

CFP® (Certified Financial Planner):

Edward Toole is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, Edward Toole may refer to himself as a CERTIFIED FINANCIAL PLANNER® professional or a CFP® professional, and Edward Toole may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirements through other qualifying credentials.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional’s services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Certified Retirement Counselor® (CRC®) Principles of Conduct:

- Principle #1 Comply with the letter and spirit of all federal and state laws that regulate advice, services, records, and transactions applicable to retirement planning or retirement administration.
- Principle #2 Act always in the best interest of the Client or individual retirement plan participant for whom services are performed; and, when performing services for a retirement plan as a whole, act in the best interest of the plan and all persons who have rights under the plan.
- Principle #3 Never disclose confidential information about the finances or status of a Client or particular plan participant unless authorized by the individual or by law.
- Principle #4 Be truthful and forthright in all communications relating to retirement services and transactions.
- Principle #5 Perform all retirement services competently, diligently, and according to the highest professional standard; the Certificant will maintain the necessary specific knowledge and expertise to do so, and decline any activity that cannot be competently performed.
- Principle #6 Conduct activities relating to the retirement profession under the highest standards of personal and professional integrity, and in ways that reflect creditably on the profession.
- Principle #7 Disclose to all persons for whom services are provided, the Certificant's source of compensation, the identity of any person or entities paying the compensation, and any material fact about the compensation that is necessary to understand potential adverse interest.
- Principle #8 Supply material information relating to the transaction or service to the person for whom services are performed (including information that is not requested), if such information is generally recognized as necessary to any informed decision.

More than 5000 retirement professionals have earned the Certified Retirement Counselor® (CRC®) certification conferred by the International Foundation for Retirement Education (InFRE).

Earning the CRC® requires sitting for a four-hour exam. In addition, certificants must meet specific education and experience requirements. Each certificant must also adhere to the CRC® Code of Ethics and commit to 15 hours of annual continuing education.

The CRC® program uniquely enhances a professional's understanding of retirement planning concepts and principles, while demonstrating their commitment to the retirement planning profession. The CRC® certification is accredited by the National Commission for Certifying Agencies (NCCA). Independent third-party "program" accreditation signifies that CRC® certificants are an elite group of qualified retirement professionals among the array of retirement-related designations available today.

Item 3: Disciplinary Information

Edward Toole has never been involved in any criminal or civil actions, administrative proceedings, self-regulatory organization (SRO) proceedings, or other hearings or formal adjudications.

Item 4: Other Business Activities

Edward Toole is not involved in any outside business activities.

Item 5: Additional Compensation

Edward Toole does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through TF.

Item 6: Supervision

Edward Toole as Chief Compliance Officer of TF, supervises the advisory activities of our firm. Edward Toole is bound by and will adhere to the firm's policies and procedures and Code of Ethics. Clients may contact Edward Toole at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Edward Toole has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.