

# **Bespoke TFC Capital, LLC**

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This Brochure provides information about the qualifications and business practices of Bespoke TFC Capital, LLC (“Bespoke”, “us”, “we”, “our”). If you have any questions about the contents of this Brochure, please contact us at 689.808.0991 or via email at [investors@bespoketfc.com](mailto:investors@bespoketfc.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about Bespoke is also available via the SEC’s website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by using a unique identifying number, known as a CRD number. The CRD number for Bespoke is 322754. The SEC’s web site also provides information about any persons affiliated with Bespoke who are registered, or are required to be registered, as Investment Advisor Representatives of Bespoke.

Bespoke is a Registered Investment Advisor. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information that you may use to determine whether to hire or retain them.

## **Item 2 Material Changes**

Since our last annual amendment filing in March 2025, we have made the following material changes to our business:

1. We increased our minimum account opening balance to \$200,000.

In the future, this section of the Brochure will discuss only the specific material changes that were made to the Brochure and will provide you with a summary of all material changes that have occurred since the last filing of this Brochure. This section will also identify the date of our last annual Brochure update.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 90 days of the close of our business' fiscal year end which is December 31. We will provide other ongoing disclosure information about material changes as they occur. We will also provide you with information on how to obtain the complete brochure. Currently, our Brochure may be requested at any time, without charge, by contacting us at 689.808.0991.

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## Item 4 – Advisory Business Introduction

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### Our Advisory Business

Bespoke TFC Capital, LLC is a Registered Investment Advisor (“Advisor”) with the States of Texas and Florida. The firm was founded in June 2022 by its owner and Chief Compliance Officer, Ronald Alexander Dedesko, CFA after accumulating twenty (20) years of institutional and hedge fund investing experience (2002 – 2022).

### Services

Bespoke TFC Capital, LLC is a fee-only Registered Investment Advisor based in Orlando, Florida. The firm serves as a fiduciary, obligated to act in the best interests of its clients, in accordance with the Code of Ethics & Standards of Professional Conduct maintained by the globally recognized CFA Institute. The firm receives neither commissions nor referral fees. Bespoke TFC Capital was founded to provide hedge fund-caliber portfolio investing structures to high-net-worth (HNW) and emerging high-net-worth (EHNW) investors.

### Active Asset Management

#### *Tailored Asset Management Services*

The investment process commences by meeting with an investor to articulate the firm’s value proposition and understand the investor’s return objectives, risk tolerance, time horizon, liquidity needs and unique considerations. An Investment Policy Statement (IPS) is created, and a customized portfolio is developed to for the investor. Once the client opens and funds an account, the firm will implement the investment structures for the client’s account. **Customized hedged stock portfolios primarily consist of customized stock investment positions that generated significant hedged income and provide investment protection.** Fixed income investments primarily consist of direct bond ownership to specifically tailor duration exposure and eliminate third-party management fees. Any potential foreign equity market ownership or commodity investments will occur via ETFs. Real estate ownership may only occur via publicly traded REIT instruments. Infrastructure investments may occur via individual equity instruments or ETFs. Unless otherwise warranted, portfolio re-allocations will principally occur after a formal portfolio review, which will occur at least once within each 18-month period.

Based on information you share with Bespoke TFC Capital, we will analyze your situation and develop a portfolio strategy with appropriate asset allocations. Our recommendations and ongoing management are based upon your investment goals, objectives and risk tolerance. We will monitor the account, trade as necessary, and communicate regularly with you.

We will work with you on an ongoing basis to evaluate your asset allocation as well as rebalance your portfolio to keep it in line with your goals as necessary. We will be reasonably available to help you with questions about your account.

\*Please note that pursuant to the investment advisory agreement you are obligated to notify us promptly when your financial situation, goals, objectives, or needs change.\*

You shall have the ability to impose reasonable written restrictions on the management of your account, including the ability to instruct us not to purchase certain stocks or other securities. These restrictions may be related to a specific company security, industry sector, asset class, or any other restriction you request.

Under certain conditions, securities from outside accounts may be transferred into your advisory account; however, we may recommend that you sell any security if we believe that it is not suitable for the current recommended investment strategy. Additionally, trading may be required to meet initial allocation targets, after substantial cash deposits that require investment allocation, and/or after a request for a withdrawal that requires liquidation of a position.

Periodically, your Account may need to be rebalanced or reallocated to achieve targeted percentages of intended asset allocation. This rebalancing or reallocation will occur as required or pursuant to the schedule we have determined together.

You will be responsible for all tax consequences resulting from the sale of any security, rebalancing or reallocation of the account. You are responsible for any taxable events in these instances. We are not tax professionals and do not give tax advice.

You will be notified of any purchases or sales through trade confirmations and statements that are provided by the custodian. These statements list the total value of the account, itemize all transaction activity, and list the types, amounts, and total value of securities held. **You will, at all times, maintain full and complete ownership rights to all assets held in your account**, including the right to withdraw securities or cash, proxy voting and receiving transaction confirmations.

## **Wrap Fee**

The Advisor does not sponsor or participate in a third-party sponsored wrap fee program.

## **Item 5 – Fees and Compensation**

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### **Asset Management Fee Schedule**

The minimum account opening balance is \$200,000, which may be negotiable based upon certain circumstances and at the Advisor's discretion. All client assets under management by the Advisor ("Assets Under Management") are held in stewardship by the third-party Custodian (see section "Item 12 – Brokerage Practices"). The asset management fee payable to Bespoke TFC Capital is referred to as the "Advisor Fee". The Advisor Fee payable is based upon the amount of Assets Under Management. Multiple accounts of immediately related family members, at the same mailing address, may be considered one consolidated account for billing purposes. The Advisor Fee is charged monthly, in arrears, which is referred to as the "Monthly Advisor Fee". The Monthly Advisor Fee will be both assessed and due on the last day of each month, based on the ending balance of Client Account(s) under management for that month. The Advisor will not pro rate for deposits and withdrawals in the account(s) during the billing period.

**The Advisor Fee will be calculated as follows:**

Assets Under Management	Advisor Fee (Annual Rate)
All Dollar Amounts	1.0%

**Monthly Advisor Fee Calculation**

**Assets Under Management x 1.0%/12 = Monthly Advisor Fee**

No increase in the Advisor Fee shall be effective without prior written notification. Bespoke believes the Advisor Fee is reasonable considering the fees charged by other investment advisers given their services/programs.

The Client (individual or entity for whom Bespoke TFC Capital provides investment advisory services for Assets Under Management) acknowledges and agrees that the Advisor may charge for certain additional assets managed for the Client by the Advisor, but not held by the Custodian (i.e. IRA, Roth IRA, 401(k), education accounts, etc.), if mutually agreed upon in writing.

**Automatic Payment of Fees**

The Client agrees to authorize the Custodian to pay the Account's Advisor Fee directly to Bespoke TFC Capital upon receipt of notice. A statement will be provided to the client showing the fee debited from the account. Fee withdrawals will occur no more frequently than monthly from the Client's Account.

The Custodian should send to the Client a statement, at least quarterly, indicating all amounts disbursed from the Account, including the Advisor Fee paid directly to Bespoke TFC Capital. **To ensure optimal Client Asset security, all client account configurations with the Custodian are structured so that Bespoke TFC Capital's access to the Assets of the Client's Account is limited exclusively to trading authorization and receipt of Advisor Fee withdrawals.**

**Third-party Fees**

Our Advisor Fee does not include brokerage commissions, transaction fees, and other related costs and expenses. You may incur certain charges imposed by custodians and other third parties. These include fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, commissions and other fees and taxes on brokerage accounts and securities transactions. Exchange-traded funds (ETFs) also charge internal management fees, which are disclosed in the fund's prospectus. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. Certain strategies offered by us may involve investment in ETFs. We do not receive any compensation from these fees. All of these fees are in addition to the management fee you pay us. You should review all fees charged to fully understand the total amount of fees you will pay. Services similar to those offered by us may be available elsewhere for more or less than the amounts we charge. Our brokerage practices are discussed in more detail under Item 12 – Brokerage Practices.

**Other Compensation**

Our IARs have no outside business for which they are compensated.

## **Item 6 – Performance Based Fee and Side by Side Management**

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We do not charge any performance-based fees.

## **Item 7 – Types of Client(s)**

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We provide investment advisory services to individuals, high net worth individuals, businesses, charitable organizations and estates. Our minimum account opening balance is \$100,000.

## **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

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### **Methods of Analysis**

We use Fundamental Analysis, Cyclical Analysis, Charting and Modern Portfolio Theory as part of our overall investment management discipline; the implementation of these analyses as part of our investment advisory services to you may include any, all or a combination of each.

#### **Fundamental Analysis**

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the underlying factors that affect a company's actual business and its future prospects. Fundamental analysis is about using real data to evaluate a security's value. It refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

The end goal of performing fundamental analysis is to produce a value that we can compare with the security's current price, with the aim of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short).

#### **Modern Portfolio Theory (MPT)**

We use Modern Portfolio Theory to help select the funds we use in your account.

Modern portfolio theory tries to understand the market as a whole, rather than looking for what makes each investment opportunity unique. Investments are described statistically, in terms of their expected long-term return rate and their expected short-term volatility. The volatility is equated with "risk," measuring how much worse than average an investment's bad years are likely to be. The end goal is to identify your acceptable level of risk tolerance, and then to find a portfolio with the maximum expected return for that level of risk.

#### **Charting Analysis**

Charting analysis is a method utilized to perform analysis and forecasting of the stock market or commodity market prices and trends. Some of the charts that are used for the analysis are bar charts, point-and-finger charts and candlestick charts. The charts are used to plot factors such as average price movement, highs and lows of prices, open interest, settlement prices and volume trading.

As with other types of analysis, the predictive nature of charting analysis can vary greatly; models and rules are often modified and updated as new patterns and behaviors develop. Past performance is not an indicator of future returns.

To perform our analysis, we use many resources, such as:

- Financial Publications
- Prospectuses
- Online Financial Resources
- Offering Documents
- EDGAR Filings
- Public Press Releases
- Annual Reports

### **Cyclical Analysis**

Cyclical analysis is a method utilized to perform analysis of systematic changes in the overall economy. Cyclical analysis looks at the cycles of an economy through expansion, peak, recession, and recovery. Most cyclical stocks involve companies that sell consumer discretionary items that consumers buy more during a booming economy but spend less on during a recession.

### **Investment Strategies**

The firm's investment universe consists exclusively of publicly traded U.S. investment vehicles, including stocks, bonds, equity derivatives, ETFs and publicly traded REITs. **Bespoke TFC Capital leadership draws upon extensive equity derivative investing experience to establish hedged U.S. equity/equity derivative structures, structured to provide downside loss protection and additional income generation.** Fixed income investments are intended to consist of direct investments in fixed income instruments such as U.S. Treasuries and corporate bonds, to specifically tailor duration exposure and with the intent of minimizing additional hidden fee exposure associated with bond funds. The firm is able to focus on its core competency – investment capital optimization – and create customized client portfolios by eschewing traditional financial planning services such as interactive cash flow budgeting, estate planning, insurance sales, etc.

The investment strategies we use to implement any investment advice given to you include, but are not limited to:

- Hedged stock investments, structured to provide downside loss protection and additional income generation.
- Tax efficient investments, structured to minimize capital gains tax obligations.



## **Risk of Loss**

We cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk. Investing in securities involves a risk of loss that you should be prepared to bear. You need to understand that investment decisions made for your account by us are subject to various market, currency, economic, political and business risks. The investment decisions we make for you will not always be profitable nor can we guarantee any level of performance.

A list of all risks associated with the strategies, products and methodology we offer are listed below:

## **Analysis Risk**

### ***Fundamental Analysis Risk***

Fundamental analysis, when used in isolation, has a number of risks:

- There are an infinite number of factors that can affect the earnings of a company, and its stock price, over time. These can include economic, political and social factors, in addition to the various company statistics.
- Events may unfold differently than what is forecasted.
- Analyst projections may be overly optimistic.
- Random unanticipated events, such as Acts of God, and compromised product/service offerings may result.

### ***Modern Portfolio Theory (MPT) Risk***

Modern Portfolio Theory tries to understand the market as a whole and measure market risk in an attempt to reduce the inherent risks of investing in the market. However, with every financial investment strategy there is a risk of a loss of principal. Not every investment decision will be profitable, and there can be no guarantee of any level of performance.

### ***Cyclical Analysis Risk***

Looking at market cycles in conjunction with other investment strategies can be useful when making investment decisions. However, market cycles are not always predictable. Each financial investment strategy has benefits and risks. Not every investment decision will be profitable, and there can be no guarantee of any level of performance.

### ***Charting Analysis Risk***

Charts can provide good insight into what may occur in the future but their primary value lies in their ability to help you manage the risk associated with investing and trading. Charts provide a rational framework to use for the management of risk. They help you to know when you should cut your losses or take your gains. They help you pinpoint when the odds of success are the highest. However, there is no way to predict the future and Charts should be part of the overall approach to analyzing the markets.

## **Product Risk**

### ***Bond Fund Risk***

Bond funds generally have higher risks than money market funds, largely because they typically pursue strategies aimed at producing higher yields of the risks associated with bond funds include:

- Call Risk - The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.
- Credit Risk — the possibility that companies or other issuers whose bonds are owned by the fund may fail to pay their debts (including the debt owed to holders of their bonds). Credit risk is less of a factor for bond funds that invest in insured bonds or U.S. Treasury bonds. By contrast, those that invest in the bonds of companies with poor credit ratings generally will be subject to higher risk.
- Interest Rate Risk — the risk that the market value of the bonds will go down when interest rates go up. Because of this, you can lose money in any bond fund, including those that invest only in insured bonds or Treasury bonds.
- Prepayment Risk — the chance that a bond will be paid off early. For example, if interest rates fall, a bond issuer may decide to pay off (or "retire") its debt and issue new bonds that pay a lower rate. When this happens, the fund may not be able to reinvest the proceeds in an investment with as high a return or yield.

### ***Exchange Traded Fund (“ETF”) Risk***

Most ETFs are passively managed investment companies whose shares are purchased and sold on a securities exchange. An ETF represents a portfolio of securities designed to track a particular market segment or index. ETFs are subject to the following risks that do not apply to conventional funds:

- The market price of the ETF's shares may trade at a premium or a discount to their net asset value;
- An active trading market for an ETF's shares may not develop or be maintained; and
- There is no assurance that the requirements of the exchange necessary to maintain the listing of an ETF will continue to be met or remain unchanged

### ***Stock Fund Risk***

Overall "market risk" poses the greatest potential danger for investors in stock funds, while "unsystematic risk" poses the greatest risk for individual stocks. Stock prices can fluctuate for a broad range of reasons, such as the overall strength of the economy or demand for particular products or services.

### ***Overall Risks***

Clients need to remember that past performance is no guarantee of future results. All funds carry some level of risk. You may lose some or all of the money you invest, including your principal, because the securities held by a fund goes up and down in value. Dividend or interest payments may also fluctuate, or stop completely, as market conditions change.

Before you invest, be sure to read a fund's prospectus and shareholder reports to learn about its investment strategy and the potential risks. Funds with higher rates of return may take risks that are beyond your comfort level and are inconsistent with your financial goals.

While past performance does not necessarily predict future returns, it can tell you how volatile (or stable) a fund has been over a period of time. Generally, the more volatile a fund, the higher the investment risk. If you'll need your money to meet a financial goal in the near-term, you probably can't afford the risk of investing in a fund with a volatile history because you will not have enough time to ride out any declines in the stock market.

## **Item 9 – Disciplinary Information**

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Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. We do not have any information to disclose concerning Bespoke or any of our IARs. We adhere to high ethical standards for all IARs and associates.

## **Item 10 – Other Financial Industry Activities and Affiliations**

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Neither Bespoke nor any of its management persons are registered as a broker-dealer or registered as a representative of a broker-dealer, nor does it have any pending application to register. In addition, neither Bespoke nor its management persons are affiliated with any broker-dealer.

Bespoke and its management persons are not registering as a commodity pool operator, futures commission merchant, or commodity trading advisor.

### **Other Financial Industry Affiliations**

The IARs of Bespoke do not participate in other business activities or have any outside affiliations at this time.

## **Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading**

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### **General Information**

We have adopted the CFA Institute Code of Ethics and Standards of Professional Conduct for all IAR's of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting

of certain gifts and business entertainment items, and personal securities trading procedures. All of our IAR's must acknowledge the terms of the Code of Ethics annually, or as amended.

## **Participation or Interest in Client Accounts**

Our Compliance policies and procedures prohibit anyone associated with Bespoke from having an interest in a client account or participating in the profits of a client's account without the approval of the CCO.

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice or course of business
- Engaging in any manipulative practices

Clients and prospective clients may request a copy of the firm's Code of Ethics by contacting the CCO.

## **Personal Trading**

We may recommend securities to you that we will purchase for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders in a sequence we believe will best benefit you.

Neither Bespoke nor any of its related persons recommend securities (or other investment products) to advisory clients in which we or any related person has some other proprietary (ownership) interest, other than those mentioned above.

Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade Order (specifying each participating account) and its allocation. Completed Orders will be allocated as specified in the initial trade order. Partially filled Orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

Bespoke has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of "Access Persons". The policy requires that an Access Person of the firm provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Advisor selects; provided, however that at any time that the Advisor has only one Access Person, he or she shall not be required to submit any securities report described above.

We have established the following restrictions in order to ensure our fiduciary responsibilities regarding insider trading are met:

- No securities for our personal portfolio(s) shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of IARs of Bespoke, unless the information is also available to the investing public on reasonable inquiry. In no case, shall we put our own interests ahead of yours.

## **Privacy Statement**

We are committed to safeguarding your confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your information. Our Privacy Policy is available upon request.

## **Conflicts of Interest**

Bespoke's IARs may employ the same strategy for their personal investment accounts as it does for its clients. However, IARs may not place their orders in a way to benefit from the purchase or sale of a security at the client's expense.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in your favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

## **Item 12 – Brokerage Practices**

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### **Factors Used to Select Custodians**

Bespoke has selected Interactive Brokers as its Custodian to steward client assets. Interactive Brokers is a publicly traded brokerage firm that was founded in 1977 with assets of \$150 Billion as of January 1, 2025. Interactive Brokers was selected given the company's exceptional trade execution capabilities, outstanding technology, high interest rates paid on client cash balances, strong legacy, institutional product offering, superior market information availability and low-cost fee structure, along with the Bespoke TFC Capital's founding member's history of investing via the platform since 2007. We strongly recommend clients use Interactive Brokers as the qualified Custodian for accounts when utilizing our asset management services.

### **Soft Dollars**

We do not engage in soft dollar agreements with any broker-dealers, custodians or third-party money managers, however, our Custodian will provide us with trading and research products and services that qualify as "brokerage or research services" under the rules. These research products and/or services will assist the IAR in its investment decision making process. Such research generally will be used to service all of the IAR's clients.

There may other benefits from recommending one Custodian over another, such as software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

### ***How We Select Brokers/Custodians***

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- capability to execute, clear and settle trades (buy and sell securities for your account)
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- breadth of investment products made available (stocks, bonds, exchange traded funds (ETFs), etc.)
- availability of investment research and tools that assist us in making investment decisions
- quality of services
- competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- reputation, financial strength and stability of the provider
- their prior service to us and our other clients
- availability of other products and services that benefit us, as discussed below

### **Best Execution**

We have an obligation to seek best execution for you. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker's services, including the value of research provided, execution capability, commission rates, reputation and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

### **Brokerage for Client Referrals**

In selecting recommending broker-dealers, we do not take into consideration whether or not we will receive client referrals from the broker-dealer or third-party.

## **Directed Brokerage**

Clients are permitted to use the custodian of their choosing. Not all advisory firms permit clients to direct brokerage. If you elect to select your own broker-dealer or custodian and direct us to use them, you may pay higher or lower fees than what is available through our relationships. Generally, we will not negotiate lower rates below the rates established by the executing broker-dealer or custodian for this type of directed brokerage account, unless we believe that such rate is unfair or unreasonable for the size and type of transaction. In all instances, we will seek best execution for you.

## **Trading**

Transactions for each client account generally will be affected independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine or “batch” such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients’ differences in prices and commission or other transaction costs. Under this procedure, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

## **Item 13 – Review of Accounts**

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### **Reviews**

#### **Discretionary Portfolio Services**

Given that client investment structures are typically implemented for time horizons of 1-2 years, comprehensive client meetings will occur within each 18-month period. Client portfolio reviews will be conducted by the firm within this 18-month period to determine whether any portfolio adjustments should potentially be implemented. Reviews will be conducted by our Chief Compliance Officer, Ronald Dedesko. Generally, we will monitor for changes and shifts in the economy, market conditions, and asset values.

### **Reports**

The Custodian provides statements to clients. Given that the Custodian’s statements reflect market value of assets, we do not provide any additional statements to clients.

## **Item 14 – Client Referrals and Other Compensation**

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We do not receive any economic benefit from someone who is not a client, for providing investment advice or other advisory services to our clients. We may directly or indirectly pay compensation to another person if they refer clients to us.

## **Item 15 – Custody**

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We do not have physical custody of any accounts or assets. However, we may be deemed to have custody of your Account(s) if we have the ability instruct the custodian to deduct the Advisor Fee from your custodial Account(s). You should receive at least quarterly statements from the Custodian that holds and maintains your investment assets. We urge you to carefully review such statements.

We do not debit the client fees directly from your Account. We send information to your Custodian to debit the Advisor Fee and to pay the Advisor Fee to Bespoke TFC Capital. You authorize the Custodian to pay the Advisor Fee to Bespoke TFC Capital directly at the onset of the relationship, via the Investment Advisory Agreement.

## **Item 16 – Investment Discretion**

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We manage assets on a discretionary basis. If you provide discretion authority, which will be evidenced via the written, discretionary agreement between the client and the Advisor, we will have the authority to determine and implement the following on your behalf:

- Securities to be bought or sold for your account
- Dollar amount of securities to be bought or sold for your account

In all cases this discretion is exercised in a manner consistent with your stated investment objectives for your account(s) and in accordance with any restrictions placed on the account(s).

When active asset management services are provided on a discretionary basis the client will enter into a separate custodial agreement with the custodian. The custodian agreement will include a limited power of attorney to trade in the client's account(s) which authorizes the custodian to take instructions from us regarding all investment decisions for your account.

## **Item 17 – Voting Client Securities**

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As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. We may provide advice to you regarding your voting of proxies. The custodian will forward you copies of all proxies and shareholder communications relating to your account assets.



## **Item 18 – Financial Information**

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We are required to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to you, our client. We have not been the subject of any bankruptcy proceedings.

## **Item 19 – Requirements for State Registered Advisors**

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### **Principals**

There is one principal of Bespoke TFC Capital: Ronald Dedesko. He is the owner and Chief Compliance Officer and was born in 1979. His education information, business background, and other business activities can be found in the Form ADV Part 2B Brochure Supplement below.

### **Performance Fees**

We do not charge a performance-based fee (fees based on a share of capital gains, or capital appreciation, of client Assets Under Management) for our normal asset management accounts.

### **Disclosable Events**

Neither Bespoke nor Ronald Dedesko have any reportable events to disclose here.

### **Other Relationships**

Neither Bespoke nor Dedesko have any relationship with any issuer of securities.

## **ADV Part 2B Brochure Supplement – Ronald Dedesko**

### **Item 1 – Cover Page**

**Ronald Dedesko**

**CRD # 7214541**

**Bespoke TFC Capital**

**6900 Tavistock Lakes Blvd., Suite 400**

**Orlando, FL 32827**

**[www.bespoketfc.com](http://www.bespoketfc.com)**

**689.808.0991**

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This Brochure supplement provides information about Ronald Dedesko and supplements the Bespoke (“Bespoke”) Brochure. You should have received a copy of that Brochure. Please contact Ronald Dedesko if you did not receive the Brochure or if you have any questions about the contents of this supplement.

Additional information about Ronald Dedesko, CRD# 7214541 is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Full Legal Name: Ronald Alexander Dedesko

Year of Birth: 1979

### Education

University of Calgary, Haskayne School of Business      2001  
Calgary, AB, Canada

### Designations

Chartered Financial Analyst (CFA®) Charterholder      2005  
CFA Institute

#### Chartered Financial Analyst (CFA®)

The Chartered Financial Analyst (CFA®) designation is a globally recognized, graduate-level investment credential, recognized for its foundation in investment analysis and portfolio management skills, and emphasizes the highest ethical and professional standards. To attain the right to use the CFA® designation, an individual must satisfactorily fulfill the following requirements:

**Prerequisites/Experience:** Complete either an undergraduate degree and four years of professional experience involving investment decision-making.

**Educational Requirements:** Complete a self-study program (at least 250 hours of study for each of the three levels).

**Examination Type:** Pass the comprehensive CFA® Certification examinations, spanning multiple years.

**Ethics:** Agree to be bound by CFA Institute's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFA® professionals.

CFA® professionals who fail to comply with the above standards and requirements may be subject to CFA Institute's enforcement process, which could result in suspension or permanent revocation of their CFA® certification.

### Business History

May 2022 – Present	Managing Partner & Sr. Investment Advisor at Bespoke TFC Capital
Jul 2018 – Apr 2022	Portfolio Manager at Three State Capital
Jul 2011 – May 2018	Vice President at Ivanhoe Cambridge
Dec 2002 – Mar 2011	Sr. Director CBRE

### **Item 3 – Disciplinary History**

Neither Bespoke nor Ronald Dedesko has any disciplinary history to disclose.

### **Item 4 – Other Business Activities**

As noted in Item 10 “Other Financial Industry Activities and Affiliations” above, Ronald Dedesko has no outside business activities and/or affiliations to disclose.

### **Item 5 – Additional Compensation**

Ronald Dedesko does not receive any other compensation.

### **Item 6 – Supervision**

Ronald Dedesko is the CCO and performs all supervisory duties for his firm.

### **Item 7 – Requirements for State-Registered Advisers**

Ronald Dedesko has no reportable events to disclose here.