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## Part 2A and 2B of Form ADV: Firm Brochure

### ITEM 1

### Cover Page

**Full Financial Inc.**

Matthew J. Rillos

Joseph L. Rillos

16475 W. 51<sup>st</sup> Place

Golden, CO 80403

[www.fullfinancial.com](http://www.fullfinancial.com)

[team@fullfinancial.com](mailto:team@fullfinancial.com)

March 1, 2025

This brochure provides information about the qualifications and business practices of Full Financial Inc. If you have any questions about the contents of this brochure, please contact us at [team@fullfinancial.com](mailto:team@fullfinancial.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. Registration does not imply a certain level of skill or training.

Additional information about Full Financial Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Firm IARD/CRD # 330574



ITEM 2

**Material Changes**

These are the material changes since the last annual update of this brochure.

2025.03.01 – Material Change Updates

- There are no material changes to report since the last update.



ITEM 3

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**ITEM 4**

**Advisory Board**

**OVERVIEW**

Full Financial Inc. is in the business of providing investment advice. Full Financial Inc. [Full Financial] became incorporated in the state of Colorado on February 29<sup>th</sup> 2024. The principal owner of Full Financial Inc. is Matt Rillos. Full Financial Inc. is an SEC registered advisor.

**SERVICES**

Full Financial Inc. provides a service of advising clients on the allocations of investments. We also provide counsel regarding financial planning, business planning, funding education, retirement planning, life and health insurance, estate planning, tax planning, for individuals and small businesses. Full Financial Inc. is a fiduciary and as such we provide full disclosure to our clients and always act in the best interest of our clients. We have discretionary authority over clients' assets that we manage which allows us to make and implement investment decisions without the clients' written or verbal approval.

Full Financial Inc. generally provides investment advice on equity securities, investment company securities, e.g. variable life insurance, annuities, mutual funds, exchange traded funds, and limited partnerships. We use commercially available services concerning investments as well as, taxation, numerous financial newspapers, periodicals, and issuer-prepared information. Outside consultants may also be employed to provide additional expertise in certain situations.

In addition to investment advice, we can provide comprehensive financial planning, supplying analysis and recommendations in the areas of business planning, education planning, retirement planning, life and health insurance, estate planning, tax planning, as well as investments for individuals and small businesses.

Full Financial Inc. provides investment advice on mutual funds, exchange traded funds, stocks, bonds, options, certificates of deposit, money markets, and cash. Advice on investment types outside of those listed above is limited. We can tailor our services based on the needs of a client. For example, a client can impose restriction on investing in certain securities or types of securities.

**ASSETS UNDER MANAGEMENT**

As of 3/1/2025 Full Financial Inc. is managing \$247,982,500 of assets under management for 264 clients.

- \$225,293,145 for 259 clients on a discretionary basis.
- \$22,689,355 for 5 clients on a non-discretionary basis.



**ITEM 5**

**Fees and Compensation**

**ASSETS UNDER MANAGEMENT FEES**

Full Financial Inc. provides a service of advising clients on the allocations of investments. Full Financial Inc. charges a fee of 1% annually on the first \$2 million dollars of assets under advisement and a fee of 0.5% annually on all assets above \$2 million dollars of assets under advisement. This fee is billed quarterly and in advance. The service may be cancelled at any time by the client. When a cancellation occurs mid-quarter the client may request that fees be refunded on a pro rata basis. Our fees may be negotiable.

**ACCOUNT MINIMUMS**

Full Financial Inc. has account minimums which are determined by each individual advisor. Account minimums may be negotiable.

**HOURLY FEES**

Full Financial Inc. is not for hire on an hourly basis.

**COLLECTING FEES**

In general, accounts under management will have their fee deducted from the accounts that are being managed. Clients will receive a notice of the quarterly fee amount in their quarterly report.

**OTHER FEES**

Clients may pay for transaction fees through a custodian. We use Charles Schwab & Co., Inc. as a custodian for individual investment accounts and Voya Financial, Principal, ADP, or John Hancock for most 401k accounts. We use Mainstar Trust for self-directed IRA accounts. We use CollegenInvest for Colorado 529 plans. These fees are reasonable and customary for buying and selling securities. Some exchange traded funds and mutual funds at Charles Schwab & Co., Inc. do not have a transaction fee. Full Financial Inc. does not receive any compensation from Charles Schwab & Co., Inc., Voya Financial, Principal, ADP, John Hancock, Mainstar Trust or CollegenInvest. It is possible that lower fees for comparable services may be available from other sources.

**COMPENSATION FROM INVESTMENT PRODUCTS**

Full Financial Inc. does not receive any compensation or commissions from the sale of investment products. Full Financial Inc. specializes in no-load and low transaction fee investments. Joe Rillos is licensed as an insurance agent in the state of Colorado and does receive commissions on the sale of life and health insurance. Commissions from the sale of insurance products create a



conflict of interest and provides an incentive to recommend insurance products based on the compensation received. We mitigate this risk by always putting our clients' best interest first.

#### **BROKERS**

We primarily use Charles Schwab & Co., Inc. as a broker due to their discounted fees, vast selection of investment choices, trading efficiencies, as convenience to the client, added protection for the client, and as an efficiency for our own business. Clients do have the option to purchase investment products that we recommend through other brokers or agents that are not affiliated with us.

#### **ITEM 6**

### **Performance-Based Fees and Side-By-Side Management**

Full Financial Inc. does not charge performance-based fees and does not have any conflicts of interest with side-by-side management.

#### **ITEM 7**

### **Types of Clients**

Full Financial Inc. generally provides investment advice to individuals, trusts, small businesses, retirement plans, and foundations. Each advisor has their own aggregate account minimum for opening or maintaining an account that may be negotiable.

#### **ITEM 8**

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

#### **METHODS OF ANALYSIS AND INVESTMENT STRATEGIES**

Full Financial Inc. recommends to investment advisory clients that they maintain a diversified portfolio of investments. Implementing the recommendations requires that the client work closely with their attorney and accountant. We generally construct portfolios to include multiple asset classes and seek to minimize individual security risk. We generally use no-load mutual funds, exchange traded funds, stocks, bonds, or CD's that can be traded electronically and have a reasonable number of shares being traded daily. Full Financial Inc. also has the ability to trade options for those clients that may be interested in this service.

The construction of portfolios involves considering the client's willingness for risk, desired potential return or loss, goals for the funds, tax considerations, and the length of time until the funds are needed. We use multiple tools to help construct a portfolio and to determine the historical



risk/reward of the portfolio. In analyzing stocks, we use multiple services to provide advice due to the limited nature of our own bottom-up analysis. We also use multiple services to screen mutual fund and exchange traded fund investments to determine their applicability to a client's portfolio, the historical investment performance, and our projection of their future potential.

We try to minimize frequent trading of securities as this can affect investment performance through increased brokerage costs, taxes and increase the probability of bad timing.

Investing in securities involves risk of loss that clients should be prepared to bear.

#### ITEM 9

### Disciplinary Information

Neither Full Financial Inc. nor any of its owners or employees has any legal or disciplinary events to report.

#### ITEM 10

### Other Financial Industry Activities and Affiliations

Full Financial Inc. uses Charles Schwab & Co., Inc. Institutional as a broker for the majority of our clients. We also use Voya Financial, Principal, ADP, or John Hancock for most 401k accounts. We use Mainstar Trust for self-directed IRA accounts. We use CollegenInvest for Colorado 529 plans. We primarily use Charles Schwab & Co., Inc. due to their discounted fees, vast selection of investment choices, trading efficiencies, as a convenience to the client, added protection for the client, and as an efficiency for our own business.

As a service to our clients Full Financial Inc. may recommend other industry partners from time to time such as lawyers, accountants, estate planners, real estate agents, or lenders. Full Financial Inc. does not have any material relationships with these industry partners, nor do we receive any material compensation for such referrals. Joseph Rillos is a licensed insurance agent in the state of Colorado. He can provide accident and health insurance as well as life insurance for clients in the state of Colorado. Insurance agents are paid commissions and thus create a conflict of interest. We mitigate this conflict by always putting the best interest of the client first.

Full Financial Inc. is an investment advisor. We are not a broker dealer, not a futures commission merchant, not a commodity pool operator, not a commodity trading advisor, nor do we recommend other investment advisors to our clients.



ITEM 11

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

Our company philosophy is to do the right thing and to treat people the way we wish to be treated. Our goal is to provide the same investment advice to a client that they would arrive at on their own if they had the same time, knowledge, ability, and inclination that we do. Our code of ethics is based on seven principals of integrity, objectivity, competence, fairness, confidentiality, professionalism, and diligence. A copy of our code of ethics is available upon request. We make investment suggestions for clients that are in line with the same investments that we use for our own personal investments (assuming similar risk/reward profiles). Because of this we buy and sell the same or similar securities for our own personal portfolios as we do for our clients. Buying and selling the same securities as a client creates a conflict of interest. We mitigate this risk with our fiduciary responsibility of always acting in the best interest of our clients.

We review each client's portfolio at least on a quarterly basis and we review our own personal portfolios at the same time. Implementation of recommendations often results in the same or similar trades performed in our own accounts as well as those of a client. In most cases trades associated with quarterly portfolio changes are implemented on the same one or two trading days in all accounts.

ITEM 12

## Brokerage Practices

See item Number 10.

We have an incentive to recommend Charles Schwab & Co., Inc. to clients in order to make our business more efficient. Having all or most of our accounts at Charles Schwab & Co., Inc. allows us to manage client portfolios, place trades, perform client fund transfers, and service accounts in a more efficient manner. The same is true for recommending Voya Financial, Principal, ADP, or John Hancock for most 401k accounts. We use Mainstar Trust for self-directed IRA accounts. We use CollegenInvest for Colorado 529 plans.

As a benefit for advisors that use Charles Schwab & Co., Inc. they provide multiple research capabilities for investments such as mutual funds, exchange traded funds, bonds, stocks, and CD's. We consider this a benefit to us and to our clients as we use these tools to help select the most appropriate investments for a client.

We do not receive any direct compensation from recommending Charles Schwab & Co., Inc., Voya Financial, Principal, ADP, Mainstar Trust, CollegenInvest or John Hancock. Any soft-dollar





value we may receive such as free investment research benefits are insignificant. Nor do we receive any client referrals by recommending any of these firms.

While we prefer for most of our clients to use Charles Schwab & Co., Inc. we may consider allowing a client to use another broker. By recommending Charles Schwab & Co., Inc. or any such broker this may not achieve the most favorable execution of client transactions and may cost clients more money. While we feel Charles Schwab & Co., Inc. provides good value it is impossible for us to determine if they are the true low-cost leader. In addition, permitting a client to choose their own brokerage firm may not achieve the most favorable execution of client transactions and may cost clients more money. We believe Charles Schwab & Co., Inc., Principal, ADP, Mainstar Trust and John Hancock all provide a fair value to the client.

Occasionally we will place block orders (buy many shares of a security for multiple clients and then distribute the shares to the appropriate accounts) with Charles Schwab & Co., Inc.. This does not reduce the transaction cost for the client, but it may have the potential to ensure that orders are executed at a better price or a more consistent price for all clients.

#### ITEM 13

### Review of Accounts

We review each of our client accounts at least on a quarterly basis. We are looking at the portfolios to determine if we need to recommend any investment changes due to performance, rebalancing, investment strategy, risk profile, market conditions, client requests, client cash needs, or management fees. The portfolios are reviewed by at least one or more of the following individuals quarterly: Matthew Rillos or Joseph Rillos. Client accounts may be reviewed more frequently if extreme market conditions or significant changes have occurred. These changes could be market gains/losses, significant changes in a particular investment, new assets, or other reasons.

Clients receive a quarterly report from us that shows investment performance against benchmark(s), asset allocation percentages, specific investments and current values, contributions and gains/losses, returns, and a summary of fees to be deducted from accounts. We also provide tax information as needed in a client's end of year report.

#### ITEM 14

### Client Referrals and Other Compensation

Full Financial Inc. generally does not provide any client referral compensation. If Full Financial Inc. chooses to provide any referral compensation, then full disclosure would be made to the new client at the time of the referral.



**ITEM 15**

**Custody**

Full Financial Inc. does not maintain custody of client's assets. Assets are held in the custody of Charles Schwab & Co., Inc., Voya Financial, Principal, ADP, John Hancock, Mainstar Trust, or Collegenest. When clients make new contributions, those funds go to the appropriate custodians and are not held or deposited by Full Financial Inc.

Charles Schwab & Co., Inc., Principal, ADP, Mainstar Trust, John Hancock, Voya Financial, Collegenest, and the mutual fund companies provide monthly or quarterly statements to clients that are available electronically or by mail.

Clients are encouraged to compare the account statements they receive from us and the qualified custodian for any discrepancies.

**ITEM 16**

**Investment Discretion**

Full Financial Inc. provides discretionary advice. This means that any investment advice we recommend can be implemented without the client's approval. If clients have questions, they can contact us to get their questions answered. Discretionary authority also authorizes Full Financial Inc. to make investment changes which are believed to be in the best interest of the client without any client notification. Clients at Charles Schwab & Co., Inc. sign a power of attorney that allows us to place trades on their behalf. These trades are in accordance with the discretionary policies above. Clients that have retirement plans at Principal, ADP, Voya Financial, or John Hancock are responsible for their own investment selections. Full Financial Inc. will help provide investment advice for Principal, ADP, Voya Financial, and John Hancock clients upon their request.

**ITEM 17**

**Voting Client Securities**

Clients are responsible for voting for their own securities. Clients will receive their proxies or other solicitation directly from their custodian or transfer agent. Clients are always welcome to contact us via phone or e-mail regarding these solicitations and seek our advice. Clients may request for Full Financial Inc. to vote securities on their behalf. If Full Financial Inc. is asked to vote proxies for a client we will always vote in the best interest of the client.

**ITEM 18**

**Financial Information**



We have discretionary authority over funds in clients' accounts, but we do not have any financial conditions that would be reasonably likely to impair our ability to meet contractual commitments to our clients. We collect fees on a quarterly basis. We do not collect fees of more than \$1,200 per client six months or more in advance. We have never been a subject of a bankruptcy as a corporation nor as individuals.

**ITEM 19**

**Requirements for State-Registered Advisers**

Please see part 2B below for executive officer and management persons formal education and business background. Full Financial Inc. is the primary business for all of our executive officers and management personnel. Joe Rillos also sells life and health insurance. Joe spends approximately 1 hours per week on this activity. Full Financial Inc. does not charge or receive any performance based fees. Full Financial Inc. does not and has not had any claims or suits filed against us. Full Financial Inc. does not have any arrangements with issuers of securities.

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



## Part 2B of Form ADV: Brochure Supplement

PART 2B ITEM 1

Cover Page Matthew J. Rillos

Matthew J. Rillos

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March 1, 2025

This brochure supplement provides information about Matthew J. Rillos that supplements the Full Financial Inc. brochure. You should have received a copy of that brochure. Please contact Matt Rillos at [Team@FullFinancial.com](mailto:Team@FullFinancial.com) if you did not receive the Full Financial Inc. brochure or if you have any question about the contents of this supplement.

Additional information about Matthew Rillos is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



ITEM 2

## Educational Background and Business Experience

Matthew Rillos (Matt) was born in 1977 and is the Founder and President of Full Financial Inc. Mr. Rillos is a class of 2000 graduate of the United States Air Force Academy, receiving his bachelor's degree in mechanical engineering. Matt served the U.S. Air Force as an Acquisition officer from 2000-2005. In the Air Force he was a program manager responsible for a +\$200M government program. Following the Air Force, Matt worked at Lockheed Martin from 2005-2007. Some of his responsibilities included providing direction and management for multimillion dollar corporate satellite investments. In 2008 Matt began his wealth management career and purchased ownership in Financial Counseling Associates, Inc. (FCA). He served as President of FCA from 2018 through 2024. On February 29<sup>th</sup>, 2024, Matt founded Full Financial Inc. and is currently serving as President.

Matt holds a Series 65 securities license (Investment Advisor). Matt completed the three year educational requirement for the Certified Financial Planner designation in August of 2008 at the College for Financial Planning in Englewood, Colorado. Matt has also passed the Certified Financial Planner certification exam and is a CERTIFIED FINANCIAL PLANNER™ practitioner. The CERTIFIED FINANCIAL PLANNER™ designation requires a bachelor of science degree, successful completion of financial education courses as approved by the CFP® board, successful passing of the comprehensive CFP® exam, a minimum of three years of experience, and a commitment to the CFP® boards ethics requirements. The designation also requires 30 hours of continuing education every two years with 2 of those 30 hours going toward the CFP boards ethics education requirement.

ITEM 3

## Disciplinary Information

Matt has no disciplinary information to report.

ITEM 4

## Other Business Activities

Matt Rillos has no other substantial business activities outside of Full Financial Inc.

ITEM 5

## Additional Compensation



Matt Rillos receives no sales awards, no referral fees, nor any other sources of additional income.

**ITEM 6**

**Supervision**

Matt Rillos is the President and owner of Full Financial Inc. Joe Rillos and Matt Rillos work as a team to implement Full Financials' services for clients.

**ITEM 7**

**Requirements for State-Registered**

Matt Rillos has not been involved in any type of arbitration or bankruptcy.



## Part 2B of Form ADV: Brochure Supplement

PART 2B ITEM 1

Cover Page Joseph L. Rillos

Joseph L. Rillos

[team@fullfinancial.com](mailto:team@fullfinancial.com)

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March 1, 2025

This brochure supplement provides information about Joseph L. Rillos that supplements the Full Financial Inc. brochure. You should have received a copy of that brochure. Please contact Matt Rillos at [Team@FullFinancial.com](mailto:Team@FullFinancial.com) if you did not receive the Full Financial Inc. brochure or if you have any question about the contents of this supplement.

Additional information about Joseph L. Rillos is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



**ITEM 2**

**Educational Background and Business Experience**

Joseph Rillos (Joe) was born in 1948 and has provided financial services to individuals and businesses since 1978. With over 40 years in the industry Mr. Rillos serves his clients with a great breadth and depth of experience. A former high school teacher and coach, he is a mathematics graduate of the Colorado College in Colorado Springs, Colorado. Joe Rillos began his financial career with Integrated Resources Equity Corporation from 1982 until 1989. He was then with Royal Alliance Associates, Inc. from 1989 until 1996. Joe then co-founded Financial Counseling Associates, Inc. where he worked from 1993 until 2024. Joe has been with Full Financial Inc. since 2024. He has a Colorado Insurance Broker License and earned the designation of Chartered Financial Consultant (ChFC). (ChFC) is the "Advanced Financial Planning" designation conferred by The American College. The ChFC professional is qualified to assist individuals, professionals, and small-business owners with comprehensive financial planning, including insurance, income taxation, retirement planning, investments, and estate planning. The ChFC curriculum provides an extensive education in financial planning, requiring nine courses, each of which is followed by an exam.

**ITEM 3**

**Disciplinary Information**

Joe has no disciplinary information to report.

**ITEM 4**

**Other Business Activities**

Joe Rillos is licensed as an insurance agent in the state of Colorado and does receive commissions on the sale of life and health insurance. Commissions from the sale of insurance products create a conflict of interest and provides an incentive to recommend insurance products based on the compensation received.

**ITEM 5**

**Additional Compensation**

Joe Rillos receives no sales awards, no referral fees, nor any other sources of additional income.





ITEM 6

**Supervision**

Joe Rillos is an employee of Full Financial Inc. Joe Rillos and Matt Rillos work as a team to implement Full Financial Inc.'s services for clients.

ITEM 7

**Requirements for State-Registered**

Joe Rillos has not been involved in any type of arbitration or bankruptcy.



## Privacy Policy

### FULL FINANCIAL INC. PLEDGE TO YOU

The trust of our clients is our most precious asset. Protecting your privacy and safeguarding your personal financial information is one of our highest priorities. The following Privacy Statement explains how we collect and protect your information. By using Full Financial Inc. services, you give your consent to the collection and use of personal information by Full Financial Inc. as explained in this statement. Any dispute over our Privacy Statement is subject to this notice and the Full Financial Inc. client agreement, including arbitration of disputes and limitation of damages.

### KEY ELEMENTS OF FULL FINANCIAL INC. PRIVACY PROGRAM

- We gather personal information about our clients in order to provide services, comply with laws, safeguard assets, and improve our services.
- We do not share your information with unaffiliated companies or persons for marketing purposes without your prior permission.

### WHY

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some, but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.

### WHAT:

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income.
- Account balances, account numbers, and account transactions.

### HOW

All financial companies need to share customers' personal information to run their everyday business as permitted by law. For example, if you have an account at Charles Schwab & Co., Inc. we share required information with Charles Schwab & Co., Inc. to set up and maintain accounts you have at their institution. In the section below, we list the reasons financial companies can share their customers' personal information, the reasons Full Financial Inc. chooses to share and whether you can limit this sharing.

Reasons We Share Your Personal Information	Does Full Financial Share?	Can you limit Sharing?
For our everyday business purposes — Such as to process your transactions, maintain your accounts, respond to court orders and legal investigations, or report to credit bureaus. This includes sharing information with Charles Schwab & Co., Inc., Voya Financial, Principal, ADP, Mainstar Trust, John Hancock or other institutions which you have accounts where sharing is required to conduct business.	Yes	No



For our marketing purposes — To offer products and services provided or endorsed by Full Financial Inc.	No	We do not Share
For joint marketing — Sharing with other financial companies to jointly market the other company's products or services	No	We do not Share
For Non-Full Financial Inc. companies to market to you.	No	We do not Share

**WHAT WE DO**

**How does Full Financial Inc. protect my personal information?**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards, secured files and buildings.

**How does Full Financial Inc. collect my personal information?**

We collect your personal information, for example, when you:

- Open an account, or deposit money.
- Through phone conversations and meetings.

If you have any questions that this statement does not address, please contact us.