Financial Planning Associates, Inc.

A Registered Investment Adviser

Brochure

Coordinated Personal Financial Planning…

FPAI

FINANCIAL PLANNING ASSOCIATES, INC

Carl Goodin, President

This brochure provides information about the qualifications and business practices of Financial Planning Associates, Inc. If you have questions about the contents of this brochure, please phone our office at 636-527-5010, or email Carl Goodin at carl@fpai.net. Our web address is www.fpai.net. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Financial Planning Associates, Inc. is available on the SEC's website at www.adviserinfo.sec.gov. Note that registration as an investment adviser does not imply a particular level of skill or training. The experience, education, and professional credentials of the firm's Principals are included in this brochure. The effective date of this brochure is August 3, 2026.

Financial Planning Associates, Inc.
300 Ozark Trail Drive, #215
Ellisville, MO 63011
Phone: 636.527.5010
www.fpai.net

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(Note: In this document, Financial Planning Associates, Inc. will be referred to as the firm, the adviser, the planner, we, us or our. The client, their, her and his will be used to refer to clients in general, including family units. However, as will be obvious by the context, in some instances personal pronouns will refer to Carl Goodin or the adviser.)

Material Changes

The most recent revision of this document was made on August 3, 2026. There have been no material changes since that date.

Advisory Business

What is the mission of Financial Planning Associates, Inc.?

We provide valuable personal financial planning and investment management services, primarily to individuals, trusts, estates, and retirement plans. Our relationship with our client is that of a fiduciary to a beneficiary. Our purpose is to assist our clients in accomplishing their financial objectives.

In 1998, Financial Planning Associates, Inc. was established as a registered investment advisor in the state of Missouri. The sole owner of the company was and is now Carl D. Goodin, CFP®. As of August 3, 2026, the firm offers comprehensive financial planning services and manages $30,323,651.57 on behalf of our clients. We are guided by the following principles.

We believe that EVERYONE needs to have an informed, coordinated personal financial plan.

The plan should reflect the values and aspirations of the individual or couple. It should be in written form. There is great potential benefit from working with an experienced CERTIFIED FINANCIAL PLANNER practitioner, who may be able to help you avoid costly mistakes and bring valuable ideas, expertise, and judgment to your planning efforts.

Regarding investment policy, our emphasis is on helping our clients manage all risks.

Our experience suggests that most people are too concerned with some types of risks and not concerned enough with, and sometimes unaware of, others. We want our clients to sleep well at night, confident that their strategy is right for them and has the potential to deliver a good return on their assets, without unnecessary volatility.

We believe that in a personal service business, small is beautiful.

When you rely on a big business for personal services, you may get lost among the masses. And when problems arise, you may be many layers away from someone who is willing and able to help you. Our approach to personal service is just that - personal service. Your situation, your goals, and your values are unique. The best answers to your questions are those that recognize your uniqueness. And when problems arise, we can help you solve them. Our president, Carl Goodin, is an experienced CERTIFIED FINANCIAL PLANNER practitioner. Carl works with and answers to every one of our clients.

Small and well-connected is *really* beautiful.

Our approach to personal service is like that of an old country doctor - friendly, personal, and independent. Our time, the 21st century, allows and requires that we be interdependent, striving to maximize resources by maintaining beneficial relationships with strategic associates, such as RightCapital, SS&C Technologies / Black Diamond Wealth Solutions / BD Salesforce CRM, Charles Schwab and Company, PreciseFP, Morningstar Direct Advisory Service, AdvicePay, fpPATHFINDER, and Microsoft Corporation. Our associates become your associates, your resources.

We are YOUR associates, bringing years of experience to your table, and bringing our resources to your problems. We can help you make better financial decisions.

Fees and Compensation

Do you charge a fee for your services?

Yes. We have bills to pay, too.

Our fees vary according to the circumstances and are negotiable. Our clients pay an annual fee for personal financial planning (PFP) services, and a quarterly asset-based fee for investment management (IM) services. The annual PFP fee can be divided into 12 equal portions payable by monthly automatic bank transfers. PFP fees are processed through AdvicePay, an independent company not affiliated with Financial Planning Associates. Thus, the firm does not maintain the client's credit card information, bank information, or username and password information in order to debit the client for payment of fees.

There is no charge for the initial meeting between the client and the planner.

Describe personal financial planning fees.

In most cases, the client will pay a specified annual fee rather than a per-hour fee.

During the preliminary meeting, the planner will specify a fee for the initial 12-month planning engagement. Upon engagement, the client will pay the specified initial fee in full or commit to making monthly bank transfers.

Initial personal financial planning fees may range from $ 1,860 to $ 5,000. Subsequent review fees are generally less, typically $780 ($65/month).

In some cases, instead of a specified fee, the planner will charge the client based on actual time expended. The planner's rate for services is $300 per hour or portion of an hour, including client research and review time. The client will receive an estimate of the time required and agree to it at the time of engagement.

Much like a personal healthcare relationship, the best personal financial planning relationship is ongoing. Our business model can be thought of like concierge services provided by medical doctors or lawyers. Our client can terminate the relationship at the end of each 12-month period by notifying us prior to the beginning of the next period.

Upon engagement, the client may rescind the financial planning and/or investment advisory agreement without penalty by delivering written notification to the adviser within five business days. Any initial payment received from the client will be refunded by mail within five additional business days. If the agreement is terminated in writing after the fifth business day, the client will be responsible for payment for actual services performed, including client research and review time at a rate of $300 per hour or portion of an hour.

Describe investment management fees.

A typical investment management fee schedule is shown below. A given client may pay less or more. Once determined, the fee schedule will not change without timely notification.

Value of the Account	Per Quarter	Per Year	Average per Year
First $500,000	0.2500%	1.00%	1.00%
$500,000+	0.1875%	0.75%	<1.00%
$750,000+	0.0875%	0.35%	<0.9167%
$1,000,000+	0.0625%	0.25%	<0.7750%
$2,000,000+	0.0075%	0.03%	<0.4413%
$3,000,000+	0.0075%	0.03%	<0.3042%

The Adviser draws a quarterly investment management fee from client accounts as shown in the schedule above. The fee is payable in advance for the coming calendar quarter or portion of a quarter and is computed and deducted from the Client's accounts on or about the first day of each calendar quarter. The fee amount is based on the aggregate value of client accounts at the end of the preceding calendar quarter. A prorated fee is charged for additions to the accounts between quarterly fee payment dates, and prorated refunds are credited to the accounts for distributions made between quarterly fee payment dates. Prorated fees and refunds are collected or disbursed on or about the next billing date, generally within 5 business days. The fees set forth above are to compensate the Adviser for its services and are in addition to other costs associated with the acquisition, disposition, or ownership of investment assets.

We do not receive commissions for securities transactions, nor do we receive 12b-1 fees. We are interested in helping you maintain and grow your assets. Our income depends on it.

Performance-Based Fees and Side-By-Side Management

We do not take performance-based fees.

Our investment philosophy and strategies assume that our purpose is, first and foremost, to help our clients manage risk. We do not believe that performance-based fees are consistent with our risk management purpose.

Types of Clients

What types of clients do we serve?

Generally, our clients are individuals, couples, families, trusts, estates, or qualified retirement plans.

Methods of Analysis, Investment Strategies and Risk of Loss

What types of services do we provide?

We provide comprehensive, coordinated personal financial planning services and investment management services. It should be noted that investing in securities involves risk of loss that client's should be prepared to bear.

Describe personal financial planning.

The intent of a personal financial planning engagement is to assist the client in developing a plan to accomplish financial objectives. The planner will endeavor to understand the client's circumstances and values to provide information and advice that contributes to the successful attainment of the stated goals. The client is free to follow or disregard the adviser's advice, including implementation recommendations.

Personal financial planning is a process. It is ongoing.

The process usually involves two or three face-to-face meetings during which the client and planner exchange information. The client provides information concerning her purpose and situation, and the planner provides insights and recommendations. Typically, the planner will use specialized software to model various client scenarios. The purpose of such modeling is to provide the client with information for making decisions.

If beneficial, web conferences may be substituted for face-to-face meetings. The adviser maintains the capability to securely transfer data electronically both to and from the client.

Circumstances change. As clients encounter changing circumstances, they are welcomed and encouraged to contact the adviser with questions. Mid-course corrections are necessary to stay on course.

It is important that the planning data be reviewed and revised annually.

Describe investment management.

The intent of investment management services is to assist the client in managing portfolio risks. To that end, the adviser will develop and recommend an investment strategy that the adviser believes will appropriately manage the various components of portfolio risk.

Is there a minimum account size?

No. We desire to provide competent, objective service regardless of account size. However, our implementation strategies will vary based on account size. Larger accounts benefit from greater diversification and economies of scale.

Are there risks?

There are always risks. The prevailing academic theories, known collectively as modern portfolio theory, suggest that the only risk-free investment is the short-term U.S. Treasury bill. By definition, this investment type has no credit risk, and historically, this asset category has yielded a return approximately equal to inflation. Of course, in a taxable account, the return on this investment would be reduced annually by the owner's income tax obligation; therefore, the investor's purchasing power would be eroded year by year. In addition, there are periods during which the return on this asset is lower than inflation. Other investment types are more likely to incur short-term losses but also more likely to deliver long-term total returns that exceed inflation. The single, perfect investment does not exist. We believe that a broadly diversified, efficient portfolio of assets increases the likelihood that our clients' financial objectives will be met.

Explain broad, efficient diversification.

As a risk-management tool, the idea of diversification is intuitive. We choose not to put all our eggs in one basket to limit our losses should that basket lose value. Any single investment egg is subject to various risks, and the economic circumstances that would cause the value of one egg to decrease would likely cause the value of others to increase. Economic circumstances are constantly changing, and the values and risks associated with various assets change accordingly. By diversifying broadly and efficiently, an investor hopes to select assets in a way that allows the portfolio to grow without unnecessary volatility.

How do we accomplish broad, efficient diversification?

The adviser will use every available resource to determine an appropriate action plan for the client. We will use portfolio modeling software to assist in understanding the behavior of capital market assets historically, but will rely ultimately on our experience and understanding to develop and implement the strategic plan.

Our primary research sources are the Morningstar and Schwab databases, which include global real- time and historical information concerning stocks, bonds, mutual funds, exchange-traded funds, hedge funds, indexes, closed-end funds, college savings plans, money market funds, insurance plans, separate accounts, variable annuities, unit investment trusts, and private equity. Access to this information allows us to understand how the various asset categories have behaved under changing circumstances. We apply this knowledge to develop investment portfolios for our clients. We use the Markowitz mean-variance portfolio optimization concept, applied with a substantial dose of good sense informed by years of experience. **While we believe that our strategy increases the likelihood that our clients will reach their financial goals, it must be understood that results are not, and cannot be guaranteed, and that the risks of the portfolio are borne by the client.**

How is our strategy implemented?

In the interest of reaching the client's financial goals the adviser will, under a limited power of attorney granted by the client, execute the purchases (or sales) of stocks, bonds, exchange traded funds, real estate investment trusts, direct participation programs, bank certificates, guaranteed interest contracts, variable insurance contracts, or any other investment type that the adviser believes would be beneficial to the accomplishment of the client's objectives.

In most cases, we choose exchange-traded funds to implement our strategy. We usually recommend that the client's financial assets be held in accounts at Charles Schwab and Company. We believe our clients are well served by our relationship with Schwab. Typically, Schwab does not charge transaction fees to the client's accounts. Also, there is generally no fee to open or close an account.

Most often, distributions from assets held in Schwab accounts will not be reinvested directly but will be automatically transferred to that account's cash equivalent fund. Reinvestment will then be made based on the investment policy and the adviser's discretion.

There may be some assets for which we believe Schwab is not the best custodian. In those cases, we will recommend alternative custodians.

In general, we believe our clients are best served by implementing a strategic asset allocation policy. That is to say, portfolio transactions usually occur to bring the portfolio more closely in line with the original category allocations developed and recommended by the adviser.

In general, we do not believe that short-term trading is likely to benefit our clients, nor do we believe that technical analysis or market-timing strategies are of value. We do believe that our clients will benefit from certain fundamental weighting strategies. Also, there may be times when we will deviate from strict adherence to strategic weightings if we believe such a deviation will benefit our client.

Can the adviser manage my employer-sponsored retirement accounts?

In some cases, the adviser can provide investment management services for client employer-sponsored retirement accounts using secure third-party trading systems.

Upon termination of employment, the adviser will recommend that retirement assets be transferred to appropriate accounts at Charles Schwab and Company. In the adviser's experience, Schwab's breadth of services and available asset types equals or exceeds those offered by other custodians, including Fidelity and Vanguard. There is generally no cost to trade a stock, bond, or ETF. If the adviser is aware of a reason that the client would be better off to maintain her assets at the employer's custodian after termination of employment, the adviser will inform the client of the same.

Disciplinary Information

Has the adviser or a management person been involved in any legal or disciplinary event?

Neither the adviser nor any management person has been involved in any legal or disciplinary event.

Other Financial Industry Activities and Affiliations

Does the adviser or any management person have other financial industry activities or affiliations?

No.

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

Does the adviser adhere to a code of ethics?

It is the practice and intent of the adviser, and Carl Goodin, CFP™, to adhere to the CFP™ Board's Standards of Professional Conduct.

At times, the interests of Financial Planning Associates, Inc. or related persons' accounts may coincide with the interests of clients' accounts; however, at no time will Financial Planning Associates, Inc. or any related person receive any added benefit or advantage over clients in these transactions. Financial Planning Associates, Inc. will maintain records of personal securities transactions involving officers and employees. All rules and regulations of the

Investment Advisers Act of 1940 will be strictly enforced. Financial Planning Associates, Inc. will not permit insider trading.

It is possible that officers or employees of Financial Planning Associates Inc. may be eligible to receive non-cash incentives for recommending insurance or securities products. Because such non-cash incentives can adversely affect investment advisory judgment in selecting products recommended to clients, it is the policy of Financial Planning Associates, Inc. not to accept, and not to allow its officers or employees to accept any such incentives with the following exceptions: (1) expenses related to due diligence travel to the place of business of a securities or insurance firm, and (2) de minimis gifts.

Brokerage Practices

Is the adviser or Carl Goodin employed by any broker dealer or securities firm?

Neither the adviser nor Carl Goodin is employed by any broker-dealer or securities firm.

Under normal circumstances, Financial Planning Associates, Inc. will recommend/require that investment management clients establish brokerage accounts with the Schwab Institutional (R) division of Charles Schwab and Company, Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although Financial Planning Associates, Inc. may recommend/require that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. Financial Planning Associates, Inc. is independently owned and operated and not affiliated with Schwab.

Schwab provides Financial Planning Associates, Inc. with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. The services are generally available to independent investment advisers on an unsolicited basis, at no charge to them, provided that at least $10 million of the adviser's clients' assets is maintained in accounts at Schwab Institutional. These services are not contingent upon Financial Planning Associates, Inc. committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are generally available only to institutional investors or that would otherwise require a significantly higher minimum initial investment.

For Financial Planning Associates, Inc. client accounts maintained in its custody, Schwab generally does not charge separately for custodial services but is compensated by account holders through commissions and other transaction-related or asset-based fees on securities trades executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes other products and services available to Financial Planning Associates, Inc. that benefit Financial Planning Associates, Inc. but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of Financial Planning Associates accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist Financial Planning Associates, Inc. in managing and administering clients' accounts include software and other technology that: (1) provide access to client account data (such as trade confirmations and accounts statements); (2) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (3) provide research, pricing and other market data, (4) facilitate payment of Financial

Planning Associates fees from its clients' accounts; and (5) assist with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services to help Financial Planning Associates, Inc. manage and further develop its business. These services may include: (1) compliance, legal, and business consulting, (2) publications and conferences on practice management and business succession; and (3) access to employee benefits providers, human capital consultants, and insurance providers. Schwab may make available, arrange, and/or pay third-party vendors for the types of services rendered to Financial Planning Associates, Inc. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or part of the fees of a third party providing the services to Financial Planning Associates, Inc.

Schwab Institutional may also provide other benefits, such as educational events or occasional business entertainment, for Financial Planning Associates, Inc. personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, Financial Planning Associates, Inc. may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest. The Adviser may benefit from being among those identified in advertisements produced by Schwab Institutional.

Review of Accounts

Describe the account review process.

The adviser recommends a joint financial planning review at least annually. In some cases, the review is conducted in the adviser's offices, in others, via web conferencing. If the client experiences a significant change in circumstances, the adviser recommends a special review. In most cases, such special reviews are at no additional cost to the client.

Client investment accounts are reviewed periodically to determine whether adjustments are needed. The adviser attempts to be continuously aware of economic and other changes that might affect portfolio results. If, in the adviser's opinion, a transaction in the client's account would be of benefit to the client, the advisor will initiate the transaction. The adviser believes that client portfolios are best served by making infrequent adjustments.

As a rule, assets in client accounts do not automatically reinvest distributions. Therefore, client accounts accumulate cash, which the adviser invests in line with the investment policy and the adviser's assessment of current economic conditions and available asset choices.

Client investment management reports are available continuously through the advisor's Black Diamond client portal.

Financial Planning Associates, Inc. requires that those involved in determining or giving financial planning and/or investment advice to clients meet the following general standards:

(1) Be a college graduate.
(2) Have a minimum of ten years' experience in personal financial planning and investment management.
(3) Currently hold the Certified Financial Planner designation.
(4) Comply with the continuing education requirements specified for the Certified Financial Planner designation.
(5) Adhere to the Code of Ethics and Professional Responsibility established by the Certified Financial Planner Board of Standards.

Client Referrals and Other Compensation

Does the adviser receive or pay compensation for client referrals?

The adviser does not receive or pay compensation for client referrals.

Custody

Does the adviser take custody of client assets?

We have limited custody of client assets due to direct fee deduction.

Investment Discretion

Does the adviser have Investment discretion?

Yes. Our clients grant us limited power of attorney to trade in their accounts and to draw our fees based on our agreed-upon fee schedule.

Voting Client Securities

Does the Advisor exercise client securities voting rights?

No. Clients retain their voting rights. They will receive their proxies or other solicitations directly from their custodian(s). Clients are welcome to contact us with questions. There is nearly a 100% chance that we will advise the client to vote in line with the board's recommendations.

Financial Information

Does the adviser require prepayment of more than $ 1,200 at least 6 months in advance?

The adviser does not.

Requirements for State-Registered Advisers

Describe the education and business background of the adviser's principal executive officer.

Carl Dwayne Goodin was born on March 7, 1951, in Springfield, Missouri. He grew up in and around St. Louis, Missouri. He attended Lafayette High School in St. Louis County, MO, where he graduated with honors. He was conferred a BM in Education from the University of Missouri at St. Louis in May of 1973. He has completed coursework toward an MA in Finance and Economics at Webster University in St. Louis, MO. His grade point average in graduate studies is 4.0. He completed the CFP professional education program (College for Financial Planning, Denver, CO) in 1989. He continues to study, analyze, and research all matters related to personal financial planning, investments, insurance, estate planning, accounting, and taxation, generally devoting from 5 to 20 hours per week to independent study and advanced seminars.

Carl D Goodin, CFP®

Having completed the education, examination, experience, and ethics requirements, he was awarded the CERTIFIED FINANCIAL PLANNER designation in March 1989.

The Financial Planning Association.

Carl Goodin has been a member of the Financial Planning Association in good standing since 1985. He has served for many years on the Board of Directors of the Financial Planning Association of Greater St. Louis, serving as Director of Professional Development, Director of Public Relations, President-Elect, and President.

Financial services career and education.

Carl Goodin began his career in finance and insurance in 1979 as an aircraft insurance (property and liability) underwriter. In 1981, he chose to continue serving the aviation community, but in a different capacity, primarily as a life and health insurance producer with the company now known as Lincoln Financial Group. During this period, his clientele expanded from aviation-associated clients to include small business owners and other professionals. Also, during this period, he became interested in providing personal financial planning services rather than focusing on life insurance sales.

In 1986, he accepted an offer to be the regional manager of the UNUM noncan disability income office in St. Louis, only to return to Lincoln Financial as regional manager in 1988. During this period, he successfully completed the examination requirements for the Missouri Uniform Securities license (Series 63), the Investment Company/Variable Contracts representative license (Series 6), the General Securities representative license (Series 7), the General Securities Principal license (Series 24), and the CERTIFIED FINANCIAL PLANNER designation.

Believing that he could offer better, more objective advice to his clients in a more independent setting, he left Lincoln Financial in 1990. He and his business partner began doing business under the name Goodin McGraw Planning Group. A few years later, he purchased his former partner's interest and, in 1998, incorporated Financial Planning Associates, Inc.

Carl D Goodin, Professor, College for Financial Planning.

From March 1999 until July 2005, Carl served as an adjunct faculty member of the College for Financial Planning, teaching all of the required classes for CFP® candidates. Those classes included: Financial Planning, Insurance, Retirement Planning, Employee Benefits, Tax Planning, Investment Planning, and Estate Planning.

Carl D Goodin, Professor, University of Missouri at St. Louis.

In July 2005, Carl resigned from his teaching position at the College for Financial Planning and became an adjunct faculty member at the University of Missouri at St. Louis, where he continued until 2015.

Has Carl Goodin been the subject of any criminal or civil actions or activities listed below?

No, Carl Goodin has not been the subject of any criminal or civil actions or activities listed below.

A. A criminal or civil action in a domestic, foreign,3. or military court of competent jurisdiction in which the supervised person

1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. was found to have been involved in a violation of an investment-related statute or regulation; or
4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the supervised person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

B. An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which the supervised person

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority

(a) denying, suspending, or revoking the authorization of the supervised person to act in an investment related business;

(b) barring or suspending the supervised person's association with an investment-related business; (c) otherwise significantly limiting the supervised person's investment-related activities; or (d) imposing a civil money penalty of more than $2,500 on the supervised person.

C. A self-regulatory organization (SRO) proceeding in which the supervised person

1. was found to have caused an investment-related business to lose its authorization to do business; or 2. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership;
(ii) otherwise significantly limited from investment-related activities; or (iii) fined more than $2,500.

D.Any other hearing or formal adjudication in which a professional attainment, designation, or license was revoked or suspended because of a violation of rules relating to professional conduct. If the supervised person resigned (or otherwise relinquished the attainment, designation, or license) in anticipation of such a hearing or formal adjudication (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.

E.If he is actively engaged in any investment-related business or occupation, including if he is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, disclose this fact and describe the business relationship, if any, between the advisory business and the other business.

1.If a relationship between the advisory business and his other financial industry activities creates a material conflict of interest with clients, describe the nature of the conflict and generally how you address it.

2.If he receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service ("trail") fees from the sale of mutual funds, disclose this fact. If this compensation is not cash, explain what type of compensation the supervised person receives. Explain that this practice gives the supervised person an incentive to recommend investment products based on the compensation received, rather than on the client's needs.

F.If he is actively engaged in any business or occupation for compensation not discussed above, and the other business activity or activities provide a substantial source of the supervised person's income or involve a substantial amount of the supervised person's time, disclose this fact and describe the nature of that business. If the other business activities represent less than 10 percent of the supervised person's time and income, you may presume that they are not substantial.

G.If someone who is not a client provides an economic benefit to him for providing advisory services, generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include the supervised person's regular salary. Any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

H.An award or otherwise being found liable in an arbitration claim alleging damages in excess of $2,500, involving any of the following:

(a) an investment or an investment-related business or activity;

(b) fraud, false statement(s), or omissions;

(c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices.

I. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

(a) an investment or an investment-related business or activity;

(b) fraud, false statement(s), or omissions;

(c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices.

J. If the supervised person has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

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