



## Fort Collins Tax Service, LLC, dba Financial Planning Fort Collins

June 16, 2023

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### Form ADV Part 2A – Firm Disclosure Brochure

#### Item 1: Cover Page

This brochure provides information about the qualifications and business practices of Fort Collins Tax Service, LLC, dba Financial Planning Fort Collins ("FPFoCo"). If you have any questions about the contents of this brochure, please contact us at 970-225-0504. 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.

FPFoCo is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training.

Additional information about FPFoCo (CRD #283890) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

#### Item 2: Material Changes

##### Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

##### Material Changes Since the Last Annual Update

- We have updated the description of Comprehensive Services and associated fees. The fee for Comprehensive Services is composed of an initial Financial Planning fee and an ongoing fee. The initial Financial Planning fee is for the development of Client's initial Financial Planning analysis and recommendations. The initial Financial Planning fee is based on complexity, and is subject to a minimum fee of \$3,000. After preparation of the initial Financial Plan, Client may elect ongoing services which include Financial Planning, Investment Management, and Income Tax Preparation Services. The ongoing fee is based on complexity, subject to a minimum annual fee of \$6,000. See Items 4 and 5 for additional information.
- Daniel C. Andrews, CFP®, AEP®, CAP®, is no longer employed by FPFoCo. His information has been removed from the Brochure Supplement (Form ADV Part 2B).

#### Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at 970-225-0504 or by email at [hello@fpfoco.com](mailto:hello@fpfoco.com).

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### Item 4: Advisory Business

Fort Collins Tax Service, LLC, dba Financial Planning Fort Collins ("FPFoCo") was founded in November of 2014 and registered as an investment advisor in May of 2016. The managing members of FPFoCo are Jason S. Speciner and Regina M. Neenan.

As of December 31, 2022, FPFoCo reports \$63,528,251 in discretionary assets under management and \$0 in non-discretionary assets under management.

FPFoCo does not act as a custodian of client assets.

This document provides important information about our services and fees, as well as all material conflicts of interest. Please read carefully.



### Comprehensive Services

FPFoCo provides Comprehensive Services that include Financial Planning, Investment Management, and Income Tax Preparation Services. Our philosophy is that providing this combination of services provides us with a more thorough view of our clients' financial circumstances, allowing us to provide more informed recommendations, advice, and investment management. Each of these service components is described more fully below.

We typically only offer our services as a combined package; services generally are no longer available to new clients on a stand-alone basis. However, we may have some legacy clients who only receive one or two services listed below, and not the Comprehensive Services package. In addition, we reserve the right in extremely limited circumstances (eg. for our employees or their immediate family) to offer each service on a stand-alone basis to new clients where we deem appropriate.

### Financial Planning Services

Financial Planning Services involve the ongoing availability of FPFoCo for in-person meetings, web conferences, phone calls, email consultations, financial planning analysis, and recommendations on an as-needed basis during the annual agreement term. Services are delivered on an as-needed basis, as soon as reasonably possible. Initial and renewal financial planning analysis and recommendations are delivered inside of sixty (60) days, dependent upon timely client delivery of required documentation. Subject areas covered in financial plans include but are not limited to:

- budgeting and cash-flow analysis & planning
- divorce planning
- education-fund planning
- employer benefits planning
- estate analysis & planning
- investment portfolio review/evaluation
- retirement account investment analysis & allocation
- retirement planning
- risk management analysis
- student loan management planning
- tax planning

### Investment Management Services

FPFoCo provides the management of individually tailored investment portfolios. We provide continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through development of a financial plan, and through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation target. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background. The goals and objectives for each client are documented in our client files. Investment strategies are created by FPFoCo that reflect the stated goals and objectives of the client.

Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Additionally, when appropriate based on a client's needs, we may recommend the use of a Third-Party Asset Manager, Outside Manager, or Sub-Advisor ("Outside Manager") for Investment Management Services. We may also assist clients with selecting an Outside Manager for the management of a qualified employer-sponsored retirement plan. We may assist clients in selecting an appropriate allocation model, completing the Outside Manager's investor profile questionnaire, interacting with the Outside Manager and reviewing the Outside Manager. Additionally, we may meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account.

The use of an Outside Manager is optional and at the client's discretion. In addition to our fee, an Outside Manager may charge our clients an additional fee. Please refer to the Outside Manager's disclosure brochure for specific policies regarding fee amounts, proration of fees for partial billing periods, billing and payment practices.

*Limited Services.* At our sole discretion, FPFoCo may agree to provide Investment Management Services on a limited basis to a member of the household of a client who is currently receiving Comprehensive Services. Under a Limited Services engagement, we provide discretionary investment management only, and do not provide any Financial Planning or Income Tax Preparation Services.

### Income Tax Preparation Services

We offer Income Tax Preparation Services under our legal entity name, Fort Collins Tax Service, LLC. We will prepare a client's individual federal and state tax return(s) annually. We will also represent clients before the Internal Revenue Service or other taxing authority for any audit/examination of a tax return prepared by us. Clients may engage Fort Collins Tax Service, LLC, separately for preparation of any tax returns for dependent children, entities under client's control, or gift or estate tax returns.

### Availability for Meetings

We are available for office, phone, and web meetings by appointment. We will do our best to accommodate your schedule; however, we generally do not hold regularly scheduled meetings after 6:00 pm Mountain time Monday through Thursday, or after 4:00 pm Mountain time on Fridays. In addition, we do not hold regularly scheduled meetings on weekends or major holidays.

## Item 5: Fees and Compensation

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Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to entering into an agreement with us, the agreement may be terminated by the client within five (5) business days of signing the agreement without incurring any fees.

### Comprehensive Services

The Fee for Comprehensive Services is composed of an initial Financial Planning fee and an ongoing fee.

The initial Financial Planning fee is for the development of Client's initial Financial Planning analysis and recommendations. The fee is determined subjectively according to the degree of complexity (defined in the Item 5 section titled "Complexity," below) associated with Client's situation and financial circumstances. FPFoCo's minimum initial Financial Planning fee is \$2,500. The maximum initial fee is dependent on a number of factors which make up the complexity of Client's situation and financial circumstances. FPFoCo also reserves the right to waive or reduce the minimum fee in



certain circumstances based on the level of services FPFoCo provides.

If Client elects to continue ongoing Comprehensive Services, the fee is for ongoing Financial Planning, Investment Management, and Income Tax Preparation Services. Comprehensive Services are priced subjectively according to the degree of complexity (defined in the Item 5 section titled "Complexity," below) associated with the client's situation and financial circumstances. The minimum annual fee for Comprehensive Services is \$6,000, which will also be stated as \$1,500 per quarter, or \$500 per month. (Note: Clients who engaged any of our services prior to January 1, 2022 may have lower minimum fees, as stated in their advisory agreement.) The maximum annual fee is dependent on a number of factors including the amount of assets we manage for a client, as well as the complexity of a client's situation and financial circumstances. It is important to note that because the fees for Comprehensive Services encompass Financial Planning, Investment Management, and Income Tax Preparation services, the total fee when expressed as a percentage of assets under management may in some cases exceed 3% of assets under management on an annual basis, but FPFoCo intends to charge fees that are reasonable in light of the services provided. We reserve the right to waive or reduce the minimum annual fee in certain circumstances based on the level of services we provide.

In cases where there is not truly unique or extraordinary complexity associated with a client's situation and financial circumstances, our fee will be based on the market value of the assets under management (AUM) for Investment Management Services, subject to a minimum fee and calculated as follows. Clients who received a services proposal prior to May 5, 2022 and subsequently signed a client agreement will have a different fee schedule, as outlined in the services proposal and client agreement.

Assets Under Management	Annual Fee (as a percentage of AUM)
\$0 - \$1,000,000	0.60%
\$1,000,000 - \$3,000,000	0.50%
\$3,000,000 - \$5,000,000	0.25%
\$5,000,000 and above	0.10%

The annual fee is prorated and paid in advance or arrears on a calendar monthly or quarterly basis, as indicated on the client's invoice or other billing statement. The fee is a blended fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the chart above.

For example, unless adjusted for complexity, a Client with \$0 in AUM or an account valued at \$500,000 would pay our minimum annual fee of \$6,000; either \$1,500 per quarter, or \$500 per month. For another example, an account valued at \$1,500,000 would pay a combined weighted fee of 0.57% or an equivalent annual dollar fee of \$8,500. The annual fee is determined by the following calculation:  $((\$1,000,000 \times 0.60\%) + (\$500,000 \times 0.50\%)) = \$8,500$ . For a final example, an account valued at \$5,000,000 would pay a combined weighted fee of 0.42% or an equivalent annual dollar fee of \$21,000. The annual fee is determined by the following calculation:  $((\$1,000,000 \times 0.60\%) + (\$2,000,000 \times 0.50\%) + (\$2,000,000 \times 0.25\%)) = \$21,000$ . Fees are prorated by day, month, or quarter as indicated on the client's invoice or other billing statement.

We aggregate the value of accounts for individuals living within the same household, their dependents, and entities under their control to determine the amount of assets under management included in the annual fee. Each individual and/or responsible party included in

this aggregation must sign a Comprehensive Services or Limited Services agreement.

All balances due for Comprehensive Services fees may be paid by credit card or electronic funds transfer, including the debiting of accounts held at a custodian where we are permitted and able to debit fees from accounts. Unless specific arrangements have been made between Client and FPFoCo, we no longer accept checks for fee payments

There is no minimum term for a Comprehensive Services agreement. Clients and/or FPFoCo may terminate a Comprehensive Services agreement at any time with written notice. If the client pays in advance, any unearned fees, measured and prorated by the number of days from the date of termination until the end of the applicable billing period, will be returned to the client. If the client pays in arrears, any earned fees, measured and prorated by the number of days from the first day of the applicable billing period through the date of termination, will be due and payable from the client. Any initial Financial Planning fee paid in advance of delivery will be refunded in full if the Agreement is terminated prior to delivery of the initial financial plan.

#### Investment Management Services

As stated above, Investment Management Services are no longer available on a stand-alone basis. Clients who have signed agreements prior to May 5, 2022 will be billed according to the fee schedule and terms outlined in the client agreement.

*Limited Services.* Clients entering into a Limited Services Agreement will pay an investment management fee as stated in the Limited Services Agreement. The fee will be calculated in a similar manner to the fee for ongoing Comprehensive Services, except that our minimum fee will not apply.

#### Financial Planning Services

As stated above, Financial Planning Services are no longer available on a stand-alone basis. Clients who have signed agreements prior to May 5, 2022 will be billed according to the fee schedule and terms outlined in the client agreement.

#### Income Tax Preparation Services

The annual fee charged for Comprehensive Services is in consideration of the complexity of Client's last filed individual income tax return as of the effective date of the agreement. Tax returns for dependent children, tax returns for entities under Client's control, gift or estate tax returns, and audit/examination representation for returns not prepared by Fort Collins Tax Service, LLC are not included.

As stated above, Income Tax Preparation Services are not generally available on a stand-alone basis. However, in those rare instances where Income Tax Preparation Services are provided on a stand-alone basis, our fees will be based on the forms and schedules included in the income tax return and may be adjusted for the time or effort required to prepare the income tax return.

#### Legacy Services, Pricing Models, and Agreements

For all services and pricing models previously offered by FPFoCo, unless the client agreement has been terminated in writing or terminated as the result of the completion of an engagement, clients will be billed according to the fee schedule and terms outlined in the client agreement.



### Other Types of Fees and Expenses

When requested by or recommended to the client, we use the Pontera technology platform to provide discretionary management of held-away accounts. Pontera charges a service fee of 0.25% of assets under management, billed in advance, using the prior quarter-end value. This service fee is paid by the client.

When requested by or recommended to the client, we use the Betterment for Advisors platform to provide discretionary management of accounts. Betterment charges a service fee of 0.15% of assets under management, billed in arrears, using the prior quarter average daily account balance. This service fee is paid by the client. If Client elects to have FPFoCo's fees debited from accounts held at Betterment Securities, Betterment will debit both Betterment's fee and FPFoCo's fee simultaneously and remit FPFoCo's fee to FPFoCo. FPFoCo fees debited from accounts held at Betterment Securities are prorated and paid in arrears on a quarterly basis, applying the fee to the average daily balance of the account during the billing period.

When requested by or recommended to the client, we may use another Outside Manager(s) to manage client accounts. The Outside Manager may charge a service fee, billed in advance or arrears, using an account valuation method preferred by the Outside Manager. This service fee is paid by the client. Please refer to the Outside Manager's disclosure brochure for specific policies regarding fee amounts, proration of fees for partial billing periods, billing and payment practices.

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

### Complexity

In determining our fees, FPFoCo evaluates the complexity of a client's financial situation in determining the fee the client will pay. FPFoCo's definition of complexity is the existence of circumstances, or lack thereof, that will require more time and effort of FPFoCo's advisors and staff to deliver valuable advice to a particular client.

Factors that may impact complexity include, but are not limited to, the following:

- income and related tax considerations
- components of net worth, including high or low amounts of assets and/or liabilities
- marital and family status
- employment status and employee benefits considerations
- business ownership
- real estate and other illiquid investment ownership
- the custodian(s) where securities are held
- overall income tax situation
- recent or upcoming relocation

- number of financial goals
- risk management plan or lack thereof
- estate plan or lack thereof
- timing of financial independence/retirement

### Item 6: Performance-Based Fees and Side-by-Side Management

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Fees are not based on a share of the capital gains or capital appreciation of managed securities. We do not offer or accept performance-based fees.

### Item 7: Types of Clients

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Our services are available to individuals and high net-worth individuals.

We do not have a minimum account or relationship size requirement, however we do have a minimum fee for Comprehensive Services. Please see Item 5 for additional details.

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

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#### Methods of Analysis

When analyzing appropriate investments for client portfolios, our primary consideration is the investment's ability to fit well within a broadly diversified investment portfolio constructed based on the principles of Modern Portfolio Theory ("MPT").

The underlying principles of MPT are:

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

Additionally, for half of the allocation to stocks/equities in client portfolios, we utilize third-party trend analysis to make rules-based allocation changes quarterly. These changes seek to over-allocate towards investment categories which have positive momentum and upward trend and under-allocate and/or avoid investment categories which have negative momentum and downward trend.

#### Investment Strategies

**When FPFoCo manages accounts:** We primarily practice active allocation strategies utilizing passive investment vehicles. This involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk, and return.





Funds that passively capture the returns of the desired asset classes are considered for placement into the portfolio. The funds that are used to build portfolios are typically index mutual funds or exchange traded funds.

This type of investment management is generally characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs). Portfolios are typically rebalanced quarterly, with a re-evaluation of the asset classes utilized, portfolio correlation, risk, and return. We rely on our own and third-party data when evaluating these factors.

Investment plans created for clients will indicate a target asset allocation, based on a client's unique circumstances, risk tolerance, and time horizon. A client's actual invested asset allocation may deviate from this target asset allocation based on our evaluation of financial markets and various investment asset classes, as well as other factors, such as income tax considerations. At any given time, a client portfolio may be invested between 0% and 100% relative to the target asset allocation specified in the investment plan – where 0% means that none of the client's account is invested and 100% means that all of the client's account is invested.

**When an Outside Manager manages accounts:** We may refer clients to an Outside Manager. Our analysis of Outside Managers involves the examination of the experience, expertise, investment philosophies, and past performance of the Outside Managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the manager's compliance and business enterprise risks. A risk of investing with an Outside Manager who has been successful in the past is that he or she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in an Outside Manager's portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

#### Material Risks Involved

*All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.* Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

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

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

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

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission

expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

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

**Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

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

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

**Inflation:** Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same. When your portfolio is not fully invested, which it may not be from time to time and possibly for extended periods of time, inflation becomes a greater risk.

**Geopolitical Risk:** The risk of financial and market loss because of political decisions or disruptions in a particular country or region.

**Catastrophic Events:** In addition to the general market risks described above, investments may be subject to the risk of loss arising from direct or indirect exposure to a number of types of catastrophic events, such as global pandemics, natural disasters, acts of terrorism, cyber-attacks, or network outages. The extent and impact of any such event on investments will depend on many factors, including the duration and scope of the event, the extent of any governmental restrictions, the effect on the supply chain, overall consumer confidence, and the extent of the disruption to global and domestic markets.

#### Risks Associated with Securities

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

**Commercial Paper** is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

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

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as



interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

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

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

**Options and other derivatives** carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the clients invest.

**Investment Companies Risk.** When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which client's invest.

## Item 9: Disciplinary Information

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The firm and its management have not been involved in any criminal or civil action, administrative enforcement proceedings, or legal or disciplinary events related to past or present clients.

## Item 10: Other Financial Industry Activities and Affiliations

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Managing Member Jason Speciner is a federally licensed tax preparer and Enrolled Agent. Approximately 25% of Mr. Speciner's time is spent on the preparation of tax returns and related activities, including the representation of clients before the Internal Revenue Service and/or state or local taxing authorities. Clients of FPFoCo are offered income tax preparation and representation services through Fort Collins Tax Service, LLC. Details are outlined in Item 5 of this brochure, under the subsection entitled Income Tax Preparation Services.

No FPFoCo employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No FPFoCo employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

No FPFoCo employee is licensed, or has an application pending to become licensed, as an insurance agent or producer.

FPFoCo does not have any related parties. As a result, we do not have a relationship with any related parties.

FPFoCo only receives compensation directly from clients. We do not receive compensation from any outside source.

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

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

### Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. The Code includes guidelines for professional standards, as well as policies regarding personal trading practices of our personnel and insider trading.

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

### Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material



financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc.

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

Our firm and its "related persons" may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

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

From time to time, our firm or its "related persons" may buy or sell securities for themselves at or around the same time as clients. We will not trade non-mutual fund securities 3 business days prior to the same security for clients.

### **Item 12: Brokerage Practices**

#### **Factors Used to Select Custodians and/or Broker-Dealers**

FPFoCo does not have any affiliation with broker-dealers. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

We do not participate in any soft dollar arrangements, nor do we receive any referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

For discretionary managed accounts, we have established relationships with qualified custodians and will recommend that clients use one of these custodians to facilitate our management of their accounts. We execute client transactions directly with the qualified custodian that holds the client account. We do not allow clients to direct us to execute transactions through a specific broker-dealer. For non-discretionary accounts, clients may custody their assets at a custodian of their choice, and are responsible for executing transactions in their accounts.

#### **The Custodians and Brokers We Use**

FPFoCo does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw advisory fees from your account (see Item 15—Custody, below). Your assets will be maintained in an account with a broker-dealer acting as a "qualified custodian."

Based on the services you need, we may recommend that you use one of several unaffiliated registered broker-dealers, member FINRA/SIPC, as the qualified custodian and broker for your accounts. We have established relationships with custodians that help facilitate our management of your accounts. These custodians include the following, though others may be added from time to time:

- MTG, LLC, dba Betterment Securities, through the Betterment For Advisors program.
- TD Ameritrade, Inc., through the TD Ameritrade Institutional program.
- Charles Schwab & Co., Inc., through the Schwab Advisor Services program.
- Guideline, Inc., through the Guideline for Advisors program.

- TIAA-CREF Individual & Institutional Services, LLC, through the Advisor Services program.
- Altruist Financial, LLC, as the introducing broker to Apex Clearing Corporation.

These custodians will hold your assets in a separate brokerage account and will buy and sell securities when we and/or you instruct them to. Although we may recommend that you use a particular custodian, you have the discretion to decide whether to do so and will open your account directly with the custodian by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with one of the custodians with which we have an established relationship, we cannot manage your account for you on a discretionary basis.

Through our participation in the adviser programs offered by these custodians, we receive various benefits, provided without cost or at a discount, that may not be available to retail customers. These benefits include access to certain investment options; execution of securities transactions; custodial services; access to an electronic trading platform, including access to aggregated block trading; the ability to deduct our advisory fee from client accounts; access to client account data; receipt of duplicate trade confirmations and account statements; research related products and tools; pricing and market data; access to software, technology or services; attendance at educational conferences and events; consulting on technology, compliance or other business matters; access to industry publications. Some of these products and services may benefit you directly, while others may benefit us by assisting us in the administration of our business and the management of client accounts, including accounts held with other custodians.

The availability of these services may be contingent upon us committing a certain number of accounts or assets under management to the custodian, but do not depend on the number of brokerage transactions directed to the custodian. The receipt of these benefits from the custodians creates a potential conflict of interest as we may have an incentive to recommend that you maintain your account with a specific custodian. However, we strive to recommend the custodian that is most appropriate for you based on your individual needs.

Note that individual custodians establish their own trading policies and procedures that limit our ability to control, among other things, the timing of the execution of trades. Execution of trades may not be instant, and we are not able to control the specific time during a day that securities are bought or sold. Custodians will generally trade on the same business day as they receive instructions from you or from us. However, transactions will be subject to processing delays in certain circumstances (e.g., orders initiated on non-business days or after markets close). For specific trading policies of Outside Managers, please refer to their disclosure documents.

#### **Aggregating (Block) Trading for Multiple Client Accounts**

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm



may participate in block trading with your accounts; however, they will not be given preferential treatment.

Outside Managers used by FPFoCo may block client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

### **Item 13: Review of Accounts**

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Client accounts under our management will be reviewed annually by the client's servicing advisor. Comprehensive Services clients will be offered an opportunity to review their portfolio with their advisor semi-annually. The account is reviewed with regards to the client's investment plan and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

FPFoCo will provide digital access to account performance reports and will mail a physical copy of these reports at the client's request. We urge clients to compare these reports against the account statements they receive from their custodian.

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

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Other than the benefits from custodians disclosed in Item 12—Brokerage Practices above, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

### **Item 15: Custody**

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FPFoCo does not accept custody of client funds except in the instance of withdrawing client fees.

For client accounts in which FPFoCo directly debits the fee:

1. FPFoCo will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
2. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the fee.
3. The client will prove written authorization to FPFoCo, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains the client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

### **Item 16: Investment Discretion**

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For those client accounts where we provide Investment Management Services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of

securities to be bought and sold. Investment discretion means that we have the ability to make investment decisions on the client's behalf, and to implement transactions in the client's account, without prior approval from the client. At the start of the advisory relationship, the client will execute a limited power of attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client.

When an Outside Manager is used, FPFoCo will assist the client with determining the program strategy or portfolio allocation to be used by the Outside Manager, to align with the Client's goals and risk tolerance, and the Outside Manager will have the discretion to manage the Client's assets according to the selected program strategy or portfolio allocation. FPFoCo will not have discretion over any accounts managed by an Outside Manager.

Clients may hold assets in other accounts over which we do not have investment discretion (for example, assets held in an employer-sponsored qualified retirement plan). If we make recommendations regarding these non-discretionary accounts as part of our Comprehensive Services, the client has the sole discretion to decide whether to implement any of our recommendations. The client is solely responsible for executing all transactions necessary to implement our recommendations. We will encourage the implementation of advice in good faith, but will not be responsible or liable for a client's failure to implement.

### **Item 17: Voting Client Securities**

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

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

In some cases, an Outside Manager may vote proxies. Please refer to the Outside Manager's disclosure brochure for information on their proxy voting policies.

### **Item 18: Financial Information**

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A balance sheet is not required to be provided because FPFoCo does not serve as a custodian for client funds or securities and FPFoCo does not require prepayment of fees of more than \$500 per client and six months or more in advance. FPFoCo has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients. FPFoCo and its affiliates have had no bankruptcies in the past 10 years.

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

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FPFoCo is 100% employee-owned. The managing members of FPFoCo are Jason S. Speciner, Daniel C. Andrews, and Regina M. Neenan. Education and business background, including any outside business activities and disclosable events for all management and supervised persons can be found in the Supplements to this Brochure (Part 2B of Form ADV).



Other than as disclosed in Item 10 above, FPFoCo does not engage in any other business activities.

Neither FPFoCo nor any of its investment adviser representatives receives any performance based fees.

Neither FPFoCo nor any of its management persons or investment adviser representatives has been involved in (a) any award or otherwise being found liable in any arbitration claim alleging damages in excess of \$2,500, or (b) any award or otherwise being found liability in a civil, self-regulatory organization, or administrative proceeding, involving an investment or investment related business or activity; fraud, false statements, or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices.

Neither FPFoCo nor any of its management persons have any relationship or arrangement with any issuer of securities.

### Important Information Regarding Rollovers

When we provide advice to clients regarding rolling over assets from an employer-sponsored qualified retirement plan ("QRP") or an existing individual retirement account ("IRA"), we are required to comply with certain Impartial Conduct Standards outlined by the Department of Labor ("DOL"). These Impartial Conduct Standards include:

- **Best Interest.** We are fiduciaries under the Investment Advisers Act of 1940, as amended. We are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act (ERISA) and/or the Internal Revenue Code (IRC), as applicable, which are laws governing retirement accounts. We are required to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests.
- **Reasonable Compensation.** Because we receive compensation for the management of your investment assets, there is an inherent conflict of interest if we recommend that you transfer assets to an account under our management. The fees for our services must be reasonable and not excessive. Compensation must be judged in the context of the services provided; therefore, higher compensation may be reasonable for more comprehensive and detailed services.
- **No Misleading Statements.** We are prohibited from making misleading statements regarding investment transactions, compensation, and conflicts of interest.

Clients should be aware that they have options regarding retirement account rollovers. Existing clients or new clients leaving an employer typically have four (4) options regarding assets in an existing retirement plan. They may:

- roll over the assets to the new employer's plan, if available, and rollovers are permitted;
- leave the assets in the former employer's plan, if permitted;
- roll over the assets to an Individual Retirement Account ("IRA"); or
- cash out the account value (tax consequences generally apply).

If our firm recommends that a client roll over retirement assets into an account that we will manage, such a recommendation creates a conflict of interest because our firm will earn fees as a result of the rollover. As a fiduciary, we mitigate this conflict of interest by disclosing it and ensuring that a recommendation to roll over retirement savings is in a client's best interest.

No client is under any obligation to roll over retirement savings to an account managed by our firm.

## Form ADV Part 2B – Brochure Supplement

### Jason S. Speciner, CFP®, EA

#### Item 1: Cover Page

This brochure supplement provides information about Jason S. Speciner and supplements the Fort Collins Tax Service, LLC, dba Financial Planning Fort Collins's brochure. You should have received a copy of that brochure. Please contact Jason S. Speciner if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Jason S. Speciner (CRD #4781020) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Year of Birth: 1982

#### Item 2: Educational and Business Experience

##### Educational Background

- **Colorado State University:** Bachelor of Science in Business Administration; 05/2004

##### Business Experience

- **Fort Collins Tax Service, LLC, dba Financial Planning Fort Collins**
  - Investment Advisor Representative/Chief Compliance Officer, 05/2016 to Present
- **Fort Collins Tax Service, LLC**
  - Managing Member/Tax Preparer, 11/2014 to Present
- **Jason Speciner, Sole Proprietor**
  - Tax and Financial Industry Consultant, 11/2015 to Present
  - Notary, 06/2009 to Present
  - Non-producing life, health, and variable insurance licensee, 10/2017 to 01/2018
  - Insurance Agent, 05/2004 to 10/2017
- **Cambridge Investment Research Advisors, Inc.**
  - Investment Advisor Representative, 07/2013 to 10/2017
- **Cambridge Investment Research Inc.**
  - Registered Representative, 07/2013 to 10/2017
- **Long Green Planning Group, LLC**
  - dba for Registered Representative & Investment Advisor Representative, Manager, 08/2010 to 07/2015
- **Cetera Advisor Networks LLC**
  - Registered Representative/Investment Advisor Representative, 07/2007 to 07/2013
- **Jason S. Speciner, LLC**
  - dba for Registered Representative & Investment Advisor Representative, Owner, 07/2007 to 12/2010
- **Waddell & Reed, Inc.**
  - Investment Advisor Representative, 06/2004 to 07/2007
  - Registered Representative, 05/2004 to 07/2007

##### Professional Designations

Employees have earned certifications and credentials that are required to be explained in further detail.

**CERTIFIED FINANCIAL PLANNER™ (CFP®):** The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (CFP Board).



The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board's Code of Ethics and Standards of Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and Standards of Conduct, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the Code of Ethics and Standards of Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

**Enrolled Agent (EA):** Enrolled Agents are enrolled by the Internal Revenue Service and authorized to use the EA designation. EA enrollment requirements:

- Successful completion of the three-part IRS Special Enrollment Examination (SEE), or completion of five years of employment by the IRS in a position which regularly interpreted and applied the tax code and its regulations.
- Successfully pass the background check conducted by the IRS.

### Item 3: Disciplinary Information

Mr. Speciner has no disciplinary events to disclose.

### Item 4: Other Business Activities

Managing Member Jason Speciner is a federally licensed tax preparer and Enrolled Agent. Approximately 25% of Mr. Speciner's time is spent on the preparation of tax returns and related activities, including the representation of clients before the Internal Revenue Service and/or state or local taxing authorities. Clients of FPFoCo are offered income tax preparation and representation services through Fort Collins Tax Service, LLC. Details are outlined in Item 5 of the firm's brochure Part 2A, under the subsection entitled Income Tax Preparation Services.

Mr. Speciner is a Notary Public.

In addition to his other business activities, Mr. Speciner provides opinion and advice to information service firms and their clients about the financial service and tax service industries. There is no conflict of interest as advisory clients of Financial Planning Fort Collins are not solicited for services for his consulting business.

### Item 5: Additional Compensation

Mr. Speciner receives additional compensation in his role as a tax preparer and business consultant; however, he receives no performance-based compensation.

Mr. Speciner does not receive any additional compensation for performing advisory services other than what is disclosed in the Form ADV Part 2A of FPFoCo, Item 5.

### Item 6: Supervision

Since Mr. Speciner is the Chief Compliance Officer of Financial Planning Fort Collins, he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. If you have any questions, he can be reached at the telephone number shown on the cover page of this document.

### Item 7: Requirements for State-Registered Advisors

Arbitration Claims: None  
Self-Regulatory Organization or Administrative Proceeding: None  
Bankruptcy Petition: None

## Regina M. Neenan, CFP®

### Item 1: Cover Page

This brochure supplement provides information about Regina M. Neenan and supplements the Fort Collins Tax Service, LLC, dba Financial Planning Fort Collins's brochure. You should have received a copy of that brochure. Please contact Jason S. Speciner if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Regina M. Neenan (CRD #7167307) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Year of Birth: 1987

### Item 2: Educational and Business Experience

#### Educational Background

- **Clarke College:** Bachelor of Arts in Spanish; 05/2010
- **University of Wisconsin-Platteville:** Bachelor of Science in Media Studies; 05/2015



#### Business Experience

- **Fort Collins Tax Service, LLC**
  - Managing Member, 03/2021 to Present
- **Fort Collins Tax Service, LLC, dba Financial Planning Fort Collins**
  - Investment Advisor Representative, 10/2019 to Present
  - Unregistered Staff, 08/2018 to 10/2019
- **Self-Employed**
  - Content Manager, 07/2018 to 10/2018
- **Active Blogs**
  - Content Manager, 04/2017 to 07/2018
  - Quality Control Editor, 07/2015 to 07/2017
- **University of Wisconsin – Platteville**
  - Student Assistant, 01/2015 to 06/2015
- **Younkers/Estee Lauder**
  - Beauty Consultant, 06/2010 to 10/2014
- **Moondog Music**
  - Salesperson, 03/2009 to 03/2013

#### Professional Designations

Employees have earned certifications and credentials that are required to be explained in further detail.

**CERTIFIED FINANCIAL PLANNER™ (CFP®):** The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (CFP Board).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board's Code of Ethics and Standards of Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and Standards of Conduct, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the Code of Ethics and Standards of Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

#### Item 3: Disciplinary Information

Mx. Neenan has no disciplinary events to disclose.

#### Item 4: Other Business Activities

None

#### Item 5: Additional Compensation

Mx. Neenan does not receive any additional compensation for performing advisory services other than what is disclosed in the Form ADV Part 2A of FPFoCo, Item 5.

#### Item 6: Supervision

Mx. Neenan is under direct supervision of Jason S. Speciner, CFP®, EA. They will adhere to the policies and procedures as described in the firm's Compliance Manual. If you have any questions, Mr. Speciner can be reached at the telephone number shown on the cover page of this document.

#### Item 7: Requirements for State-Registered Advisors

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None