

Firm Brochure

(Part 2A of Form ADV)

FOUNDATION FINANCIAL PLANNING, LLP

dba FFP WEALTH MANAGEMENT

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This brochure provides information about the qualifications and business practices of Foundation Financial Planning, LLP dba FFP Wealth Management FFP (hereinafter FFP.) If you have any questions about the contents of this brochure, please contact us at: 763-231-2760, or by email at: info@ffpwealthmanagement.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

FFP is a Minnesota registered investment advisor and its representatives are in compliance with the current filing requirements imposed upon registered investment advisors and their representatives in the State of Minnesota. Clients should be aware that the term "Registered Investment Adviser" does not imply any certain level of skill or training. Additional information about FFP is available on the SEC's website at www.adviserinfo.sec.gov.

April 5, 2011

Material Changes

Annual Update

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

Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

During 2010 Roger C Kruse gifted a 1% interest in FFP to his spouse JoAnne C Kruse. On December 31, 2010, FFP Partner Ronald M Kruse sold his entire interest in FFP to Roger C Kruse, Partner. Ronald M Kruse retired as an advisor and partner of FFP.

In 2011, FFP updated the fee schedule to include minimum fees.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 763-231-2760 or by email at: info@ffpwealthmanagement.com.

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Advisory Business

Firm Description

Foundation Financial Planning, LLP dba FFP Wealth Management was founded in 1997.

FFP provides personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

FFP is strictly a fee-only financial planning and investment management firm. The firm does not receive commissions for purchasing or selling annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions or finder's fees in any form are accepted.

Investment advice is an integral part of financial planning. In addition, FFP advises clients regarding cash flow, college planning, retirement planning, tax planning, inheritance and estate planning.

Investment advice is provided, with the client making the final decision on investment selection. FFP does not act as a custodian of client assets. The client always maintains asset control. FFP places trades for clients under a limited power of attorney.

A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

Principal Owners

Roger C. Kruse is a 99% partner. JoAnne C Kruse is a 1% partner.

Types of Advisory Services

FFP provides investment supervisory services, also known as asset management services; furnishes investment advice through consultations.

On more than an occasional basis, FFP furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of December 31, 2010, FFP manages approximately \$63,174,070 in assets for approximately 199 clients. Approximately \$62,137,813 is managed on a discretionary basis, and \$1,036,257 is managed on a non-discretionary basis.

Tailored Relationships

The goals and objectives for each client are documented. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Financial Planning Agreement

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Advice regarding investments and recommendations regarding their finances are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

The typical fee for a financial plan is predicated upon the facts known at the start of the engagement. The fees could range from \$2,500 to \$25,000 and is negotiable. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to one month without incurring additional fees. Follow-on implementation work may be billed separately at the rate of \$250 per hour.

Advisory Service Agreement

Most clients choose to have FFP manage their assets in order to obtain ongoing in-depth advice and life planning. A wide range of aspects of the client's financial affairs are reviewed. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. An Advisory Service Agreement is in addition to financial planning such as: cash flow management; insurance review; investment management (including performance reporting); education planning; retirement planning; inheritance planning; estate planning; income tax planning and tax preparation, as well as the implementation of recommendations within each area.

A typical client will execute a financial planning agreement and investment management agreement separately.

The annual Advisory Service Agreement fee is based on a percentage of the investable assets according to the following schedule:

**Investment Management Fees
Marginal Fee Table**

\$1,750 for the portion from 0 up to 100,000	plus
1.50% of the portion over 100,000 and up to 150,000	plus
1.25% of the portion over 150,000 and up to 300,000	plus
1.00% of the portion over 300,000 and up to 750,000	plus
0.75% of the portion over 750,000 and up to 1,000,000	plus
0.50% of the portion over 1,000,000 and up to 2,000,000	plus
0.35% of the portion over 2,000,000 and up to 5,000,000	plus
0.10% of the portion over 5,000,000	

The minimum annual fee is \$1,750 and is negotiable. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

On a quarterly basis, all accounts listed under Exhibit A of the investment agreement are aggregated and the total is applied to the above marginal

brackets to determine the annual management fee. One fourth (1/4) of the annual fee is collected each quarter in advance. The fee is prorated across all accounts.

Calculating the Asset Management Fee

The minimum fee of \$1,750 applies to the amount below \$100,000

The 1.50% fee applies to the amount over \$100,000 and up to \$150,000 and is in addition to the amount for the prior bracket of \$1,750.

The 1.25% fee applies to the amount over \$150,000 and up to \$300,000 and is in addition to the aggregated amounts in the prior two brackets of \$1,000 and \$1,500.

The 1.00% fee applies to the amount over \$300,000 and up to \$750,000 and is in addition to the aggregated amounts in the prior three brackets of \$1,000, \$1,500, and \$1,875.

The 0.75% fee applies to the amount over \$750,000 and up to \$1,000,000 and is in addition to the aggregated amounts in the prior four brackets of \$1,000, \$1,500, \$1,875, and \$4,500.

The 0.50% fee applies to the amount over \$1,000,000 and up to \$2,000,000 and is in addition to the aggregated amounts in the prior four brackets of \$1,000, \$1,500, \$1,875, \$4,500, and \$1,875.

The 0.35% fee applies to the amount over \$2,000,000 and up to \$5,000,000 and is in addition to the aggregated amounts in the prior five brackets of \$1,000, \$1,500, \$1,875, \$4,500, \$1,875, \$5,000 and \$10,500.

The 0.10% fee applies to the amount over \$5,000,000 and is in addition to the six prior brackets of \$1,000, \$1,500, \$1,875, \$4,500, \$1,875, \$5,000 and \$10,500

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Tax preparation work is performed as an integral part of the Advisory Service Agreement. FFP offers Federal and State income tax preparation services. When applicable, returns are filed electronically without an additional fee.

Investment Management Agreement

An *Investment Management Agreement* may be executed when investment advisory services financial planning is not provided as part of the relationship. The fee for Investment Management services is the same as the fee schedule referenced in the Advisory Service Agreement section.

Tax Preparation Agreement

Tax preparation work performed as a service independent from the other services of FFP. Most returns are will be completed and filed at our minimum fee for tax preparation of \$150. Complicated returns and bookkeeping services could be billed extra based on a per form rate or at an hourly rate of \$150 per hour. Eligible federal and applicable state returns are filed electronically without an additional fee.

Hourly Planning Engagements

FFP provides hourly planning and consulting services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is between \$150 to \$250.

Asset Management

Assets are invested primarily in no-load or low-load mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. FFP does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through FFP.

Termination of Agreement

This Agreement may be terminated by the client on the date occurring five days following delivery by the client to FFP of written notice of such

termination or such later date as set forth in the termination notice and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. Account transfer instructions delivered to the account custodian is not considered a notice of termination until proper written notice is delivered to FFP. Liquidation and transfer instructions will not be executed without proper delivery of written notice. If the client made an advance payment, FFP will refund any unearned portion of the advance payment within 90 days.

A termination fee of \$1,000 is due with termination notice if the Agreement is terminated within 12 months of the original date of the agreement. If payment does not accompany the termination letter the client understands that the termination fee will be deducted by FFP from the client's investment account. Client agrees to pay the termination fee and interest compounding at a rate of 2.0% per month, plus any legal or other collection fees if the payment is not received or if sufficient funds are not available in the client account.

FFP may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, FFP will refund any unearned portion of the advance payment.

On the 30th day following delivery of termination notice, or if the exchanges are closed on the 30th day, on the first day the exchanges are open after the 30th day, all positions will be liquidated and the fund balance net of trading and custody fees will be distributed to the address of record via US Mail.

Fees and Compensation

Description

FFP bases its fees on a percentage of assets under management, hourly charges, and or fixed fees.

Some *Retainer Agreements* may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship.

Financial plans are priced according to the degree of complexity associated with the client's situation.

Fees are negotiable.

Fee Billing

Investment management fees are billed quarterly, in *ADVANCE*, meaning that your fee covers the period until the end of the calendar quarter. For example, the fee paid on April 5th covers the period from April 1 until June 30th. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Fees for most financial plans are typically billed \$500 in advance, with the balance due upon delivery of the financial plan. More complicated cases may require larger fees in advance.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security. The custodian may have other fees and charges including custody fees, statement fees, termination fees or other fees.

FFP, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. SEC regulations may result in short term redemption fees. The short term redemption fee is not a sales charge and any fees charged by the fund belong to the fund. These fees are in addition to the fees paid by you to FFP or the custodian.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Performance figures quoted by variable annuity companies in various publications are after the sub-account fees have been deducted but before the insurance company fees and expenses have been deducted.

Past Due Accounts and Termination of Agreement

FFP reserves the right to stop work on any account that is more than 30 days overdue. In addition, FFP reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in FFP's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 90 days.

Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

FFP does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

FFP generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

The minimum account size is \$100,000 of assets under management, which equates to an annual fee of \$1,750.

When an account falls below \$100,000 in value, the minimum annual fee of \$1,750 is charged. Depending upon circumstances, FFP will sign an *Hourly Agreement* with the client if assets have diminished significantly below \$100,000.

FFP has the discretion to waive the account minimum. Accounts of less than \$100,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$100,000 within one year. Other exceptions will apply to employees of FFP and their relatives, or relatives of existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that FFP may use include Bloomberg, CNBC, CSPAN, articles, radio and television broadcast; Thomson Investment View, Morningstar Principia mutual fund information, Morningstar Principia stock information and the World Wide Web.

Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation utilizing a core and satellite approach. This means that we use a target portfolio allocation and then modify it on a per client basis. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Other strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling

companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been disciplined as a result of any complaint or legal events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

FFP is not registered as a securities broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor.

Affiliations

FFP does not have arrangements that are material to its advisory business or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

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

Code of Ethics

The employees of FFP have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

FFP and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the FFP *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of FFP is Roger C Kruse. The CCO reviews all employee trades each quarter. His trades are reviewed by Tiffany Brynteson. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

FFP does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. FFP recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

FFP recommends discount brokerage firms and trust companies (qualified custodians), such as National Advisors Trust, Inc, FSB.

Principals of FFP are shareholders of National Advisors Holdings, Inc. (NAH), a Delaware corporation organized in August of 1998. Such persons hold a minority interest, in the aggregate, of the outstanding stock of NAH. NAH has formed a federal trust company known as National Advisors Trust Company (NATCO). NATCO plans to provide trust services to clients of investment advisory firms, such as FFP, across the United States. Clients should be aware that this arrangement provides a conflict of interest and an incentive for FFP to request the use of NATCO due to the theoretical gain that the Principals of FFP may receive through the use of NATCO.

In directing the use of NATCO it should be understood that FFP will not have authority to negotiate commissions or obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to other clients.

FFP *DOES NOT* receive fees or commissions from any of these arrangements.

Best Execution

FFP reviews the execution of trades at each custodian each quarter. The review is documented in the FFP *Compliance Manual*. Trading fees charged by the custodians is also reviewed on a quarterly basis. FFP does not receive any portion of the trading fees.

Soft Dollars

FFP does not receive soft dollars from clearing firms, custodians, mutual funds or other sources

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Review of Accounts

Periodic Reviews

Account reviews are performed quarterly by advisors Roger C Kruse and Tiffany K Brynteson. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Regular Reports

Account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive periodic communications on at least an annual basis. *Advisory Service Agreement* clients, *Investment Management* clients, and *Retainer Agreement* clients receive written quarterly updates via email or US

Mail. The written updates may include a net worth statement, portfolio statement, tax return (if the client requests tax preparation services).

Client Referrals and Other Compensation

Incoming Referrals

FFP has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

FFP does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

Principals of FFP are shareholders of National Advisors Holdings, Inc. (NAH), a Delaware corporation organized in August of 1998. Such persons hold a minority interest, in the aggregate, of the outstanding stock of NAH. NAH has formed a federal trust company known as National Advisors Trust Company (NATCO). NATCO plans to provide trust services to clients of investment advisory firms, such as FFP, across the United States. Clients should be aware that this arrangement provides a conflict of interest and an incentive for FFP to request the use of NATCO due to the theoretical gain that the Principals of FFP may receive through the use of NATCO.

In directing the use of NATCO it should be understood that FFP will not have authority to negotiate commissions or obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to other clients.

Custody

SEC "Custody"

Custody of certain types of accounts, such as when a firm has durable power of attorney, acts as a trustee, or when an employee acts as a trustee of an unrelated trust and the firm acts as the investment adviser to that trust. When a firm has such custody, an annual surprise audit of those custodied accounts is performed by an independent CPA firm in compliance with SEC requirements. FFP does not have custody of client funds.

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided on an occasional basis by FFP .

Net Worth Statements

Clients are frequently provided net worth statements and net worth graphs that are generated from our client relationship management system. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. FFP is not deemed to be managing assets based on the submission of statements by a client or by a listing of an asset on a net worth or other FFP generated statement. The net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

Investment Discretion

Discretionary Authority for Trading

FFP accepts discretionary authority to manage securities accounts on behalf of clients. FFP has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, FFP consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. FFP does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the FFP investment strategies

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. The FFP Investment Management Agreement and Liability Disclosure contains a limited power of attorney so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

FFP does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, FFP will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Financial Information

Financial Condition

FFP does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because FFP does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$600 per client, and six months or more in advance.

Business Continuity Plan

General

FFP has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Information Security Program

Information Security

FFP maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

FFP is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

FFP requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP[®], CRPC[®], a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

Professional Certifications

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

Certified Financial Planner[™] (CFP[®]): Certified Financial Planners are licensed by the CFP[®] Board to use the CFP[®] mark. CFP[®] certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP[®] Board (www.CFP.net).
- Successful completion of the 10-hour CFP[®] Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Chartered Financial Analyst (CFA): Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
- Successful completion of all three exam levels of the CFA Program.
- Have 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

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.

ROGER C. KRUSE, ChFC, CFP[®], EA

Year of Birth: 1958

EDUCATION:

Certified Financial Planner Board of Standards Inc. 2003 Certification

CFP[®] Board Certification Exam

Denver, CO

The Society of Financial Service Professionals 1995 Conferment

Chartered Financial Consultant (ChFC)

Bryn Mawr, PA

The American College 1995 Diploma

Education for Performance (Financial Planning)

Bryn Mawr, PA

Financial Planning Applications 1994

Financial Decisions at Retirement 1994

Fundamentals of Estate Planning II 1994

Fundamentals of Estate Planning I 1994

Wealth Accumulation Planning 1994

Investments 1994

Individual Life & Health Insurance 1994

Fundamentals of Financial Planning 1993

Income Taxation 1993

Financial Systems In The Economy 1993

Brown College, Mendota Heights, MN

Computer Programming - 1982

BUSINESS BACKGROUND:

Foundation Financial Planning, LLP dba FFP Wealth Management 1997-current

Public speaking/educational seminars 1990-current

University of Minnesota guest lecturer 1994?-current

Your Financial Toolbox radio and television program 1999 to 2008

Equitas America, LLC Registered General Securities Principal, 1999 to 2006

Midland Life Insurance 1999-2004

FSC Securities Corp Registered General Securities Principal 1995-1999

Foundation Financial Services 1992 to 1997

Franklin Life Insurance Agent and Registered Representative 1993-1995

Royal Alliance Registered Representative 1992-1993

Successful Money Management 1990-1992

Securities America Registered Representative 1990-1992

Security Life of Denver 1990-1992

Counsel Financial Planning 1990-1992

Tiffany K Brynteson, CRPC®

Year of Birth: 1971

EDUCATION:

University of Wisconsin - River Falls, Wisconsin

Bachelor of Arts – Physical Education - 1995

Minors: Health Education and Coaching

College of Financial Planning

Chartered Retirement Planning Counselor Certification 2002

BUSINESS BACKGROUND:

FFP Wealth Management, Minneapolis, Minnesota

Financial Advisor 5/2006 – present

Wade Financial Group, Inc. Minneapolis, Minnesota

Financial Advisor, Manager of Asset Mgmt/Client Services 4/2003 – 4/2006

Manager of Marketing and Client Services 4/2000 – 4/2003

Lifetime Fitness, Eden Prairie, Minnesota

General Manager – Brooklyn Park Location 1998 - 2000

Sales Manager/Operations Manager – Roseville Location 1997 – 1998