

St. Louis Financial Planners Asset Management LLC  
1415 Elbridge Payne Rd. Ste. 140  
Chesterfield, MO 63017

Telephone: 636-532-3900  
Email: [info@stlfp.com](mailto:info@stlfp.com)  
Web Address: [www.stlfp.com](http://www.stlfp.com)

May 9, 2012

St. Louis Financial Planners Asset Management LLC (STLFPAM). This brochure provides information about the qualifications and business practices of St. Louis Financial Planners Asset Management LLC.

If you have any questions about the contents of this brochure, please contact us at 636-532-3900. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about STLFPAM is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can access this information by a unique identifying number, known as a CRD number. Our firm's CRD number is 106999.

## **Item 2 Material Changes**

The SEC adopted "Amendments to Form ADV" in July, 2010. This Firm Brochures, dated 5/9/2012, is our new disclosure document prepared according to the SEC's new requirements and rules. As you will see, this document is a narrative that is substantially different in form and content, and includes some new information that we were not previously required to disclose.

This brochure is an update to the firm brochures dated 4/9/12. This brochure has been amended to include item 19, requirements for state registered advisers.

Consistent with the new rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary. Furthermore, we will provide you with other interim disclosures about material changes as necessary. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

<b>Item 3</b>	<b>Table of Contents</b>	<b>Page</b>
Item 1	Cover Page	1
Item 2	Material Changes	2
Item 3	Table of Contents	3
Item 4	Advisory Business	4
Item 5	Fees and Compensation	5
Item 6	Performance-Based Fees & Side-by-Side Management	6
Item 7	Types of Clients	6
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss	7
Item 9	Disciplinary Information	15
Item 10	Other Financial Industry Activities and Affiliations	15
Item 11	Code of Ethics, Participation or Interest in Client Transactions & Personal Trading	16
Item 12	Brokerage Practices	17
Item 13	Review of Accounts	18
Item 14	Client Referrals & Other Compensation	18
Item 15	Custody	19
Item 16	Investment Discretion	19
Item 17	Voting Client Securities	19
Item 18	Financial Information	19
Item 19	Requirements for State Registered Advisers	20

#### **Item 4 Advisory Business**

St. Louis Financial Planners Asset Management LLC provides discretionary advisory services to individuals, high net worth individuals, pension and profit sharing plans, charitable organizations, and corporations or other businesses. STLFPAM was formed in the state of Missouri and has been a registered investment adviser since 1996. Adviser provides portfolio management, selection of other advisers, and active management services, and or the selection of other third-party managers.

STLFPAM provides active management advice in mutual funds, variable annuities and variable life contracts. As opposed to buy and hold strategies, active management is the process of constantly monitoring potential investments and making periodic changes to the portfolio. The management service is performed on a discretionary basis; however STLFPAM does not have custody of the client's funds or securities. STLFPAM offers different models of investment strategies in both mutual funds and variable annuities.

STLFPAM clientele consists of financial advisers that have arrangements to market the services of STLFPAM. Financial advisers meet with individual clients to determine the best adviser service for their needs. Financial advisers will complete a Strategic Financial Planning Survey and Questionnaire to determine net worth and suitability for the best services offered by STLFPAM to meet their individual client's needs. The portfolio selected for the client is customized to their individual risk/return need. The Dynamic Asset Allocation, Dynamic Intermediate, and Asset Class Rotation models each have five different levels of risk. Fifteen different models with fifteen different risk/return characteristics. This is accomplished by adjusting the weighting of fixed income within the model portfolio. Each client's portfolio is then a managed in manner that best suits their needs/expectations.

As of July 2011, STLFPAM was actively managing \$84,169,501 of clients' assets on a discretionary basis.

#### **Principal Owners & Executive Officers:**

Timothy D. Hunt - President	33.3%
Daniel E. Hunt Vice-President	33.3%
Casey D. Hunt – Chief Compliance Officer	33.3%

## **Item 5 Fees and Compensation**

### **Fee Schedule for Daniel E. Hunt and Casey D. Hunt**

#### Dynamic Asset Allocation & Asset Class Rotation

\$50,000 and less	2.50% of the account
\$50,001 - \$100,000	2.25% of the account
\$100,001 - \$500,000	2.00% of the account
\$500,001 and over	1.75% of the account

#### Strategic Asset Allocation & Socially Conservative Asset Allocation

\$100,000 and less	1.75% of the Account
\$100,001 - \$250,000	1.50% of the Account
\$250,001 and over	1.25% of the Account

Dan & Casey Hunt currently provide advisory services for 157 clients.

### **Fee Schedule for Timothy D. Hunt, Daniel Hunt & Casey Hunt**

#### Variable Annuity Asset Allocation

\$100,000 and less	.70% of the Account
\$100,001 - \$250,000	.60% of the Account
\$250,001 and over	.50% of the Account

### **Fee Schedule for Timothy D. Hunt**

#### Dynamic Asset Allocation & Asset Class Rotation

\$250,000 and less	2.50% of the Account
250,001 - \$500,000	2.25% of the Account
\$500,001 - \$1,000,000	2.00% of the Account
\$1,000,001 and over	1.75% of the Account

#### Income Portfolio

1.75% of the Account

Percentages are calculated on market value.

Timothy Hunt currently provides advisory services for 285 clients.

STLFPAM uses a platform of no-load, NAV load mutual funds, index funds, "C" and "H" shares (12b1) funds, and exchange traded funds (ETF's).

STLFPAM retains the right to negotiate fees at its own discretion. Adviser retains the right to modify the fee schedule for future agreement years by notifying the client thirty days before the effective date of any modification. Fees are calculated and payable in arrears, they are deducted quarterly or semi-annually depending on the advisory agreement the client signed. STLFPAM will deduct the fees from the clients' assets. STLFPAM's advisory client has the right to terminate the contract without penalty within five (5) business days after entering into the contract. Upon termination of the advisory agreement fees will be prorated to the amount of days in which the client received STLFPAM service. Clients are under no obligation to act on the investment adviser recommendations. The client is under no obligation to effect the transaction through the licensed broker-dealer STLFPAM has recommended and has the option to purchase investment products through other brokers or agents that are not affiliated with STLFPAM. There is a \$14.95 charge for equity trades and \$18.95 for mutual fund trades. For equity trades that are 10,000 shares or more there will be a 1 ½ cents per share additional fee for each trade. Retirement accounts have an annual maintenance fee of \$40.00 and a liquidation fee of \$75.00 when account is closed.

#### **Item 6 Performance-Based Fees and Side-By-Side Management**

Investment Advisers of STLFPAM do not charge performance-based fees.

#### **Item 7 Types of Clients**

STLFPAM provides investment advice to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, Corporations or business entities. STLFPAM has no minimum account size.

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

### Method of Analysis

St. Louis Financial Planners Asset Management, LLC utilizes both technical and fundamental analysis as its primary method of analysis. Technical Analysis is the study of the market action itself as measured by the market price and volume. Market charts are used to identify the dominate trends in the major market indices and asset classes. Our discipline then ranks the asset classes and/or sectors and invests in those exhibiting the highest returns relative to risk. The investment vehicles used are no-load index mutual funds that rely on fundamental analysis in the weighting of the individual security holdings. Fundamental analysis is a method of security valuation that examines a company's financials including sales, earnings, growth potential, assets, debt, etc.

The Income Portfolio uses both fundamental analysis and in-depth individual company research for its security selection.

### Investment Strategies

#### **Utilized by Daniel Hunt and Casey Hunt**

#### **Dynamic Asset Allocation**

Dynamic Asset Allocation Model seeks growth of capital with an emphasis on controlling risk through the use of multiple asset classes and the implementation of proprietary technical indicators and fundamentally driven portfolios. The Dynamic Allocation Models will utilize multiple strategies of long and intermediate term active portfolio management programs. The model employs an Asset Class Rotation strategy that buys indexed asset classes exhibiting relative strength; Tactical strategies that can seek the safety of money market when the support, resistance, and trend following models dictate; fixed income strategies; hedging strategies; and other strategies including but not limited to a momentum and contrarian model that utilized sector rotation.

Asset Class Rotation Model's objective is the growth of capital through the purchase of various indexed groups of equities called asset classes. The investment vehicles rely on fundamental analysis to determine the weighting of the individual equities in their portfolio. Through the utilization of long and intermediate term strategies, we monitor the asset classes daily and rotate into the investment style exhibiting relative strength. To control risk we rank each asset class based on relative strength performance utilizing proprietary technical indicators and seek to rotate out of the weakest and into the strongest asset classes. Unlike the Dynamic Asset Allocation strategy, the Asset Class Rotation

strategy will not exit position into the money market, but rather remain fully invested.

## **Strategic Asset Allocation**

Aggressive Growth Asset Allocation model is the highest-risk return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 100% directly must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 100%. In order to reduce the correlation of the Clients holdings to the U.S. stock markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation compared to investing in only U.S. Securities. The equity portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar, Inc. an investment research firm.

Growth Asset Allocation model is the second to highest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 70%-90% in equity securities and 10%-30% in fixed income securities depending on the portfolio objective. This is done directly in equity securities and fixed income securities or in equity securities and fixed income securities through mutual funds. In order to reduce the correlation of the Clients holdings to the U.S. Stock markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation in the amount of 10%-20% of the all-equity model. The equity portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar, Inc. The balance of this model is invested in U.S. and global government fixed income securities, corporate investment grade, and emerging market fixed income.

Moderate Growth Asset Allocation model is the next to the lowest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 50%-70% in equity securities and 30%-50% in fixed income securities depending on the portfolio objective. This is done directly in equity securities and fixed income securities or in equity securities and fixed income securities through mutual funds. In order to reduce the correlation of the Clients holdings to the U.S. Stock markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation in the amount of 30%-40% of the all-equity model. The equity



portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar, Inc. The balance of this model is invested in U.S. and global government fixed income securities, corporate investment grade, and emerging market fixed income.

Conservative Growth Asset Allocation is the lowest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 10%-30% in equity securities and 70%-90% in fixed income securities depending on the portfolio objective. This is done directly in equity securities and fixed income securities or in equity securities and fixed income securities through mutual funds. In order to reduce the correlation of the Clients holdings to the U.S. Stock markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation in the amount of 50%-60% of the all-equity model. The equity portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar, Inc. The balance of this model is invested in U.S. and global government fixed income securities, corporate investment grade, and emerging market fixed income.

In order to remain consistent with the asset allocation and portfolio holdings, each model will be reviewed and monitored on a monthly basis. Rebalancing will be utilized in order to keep the portfolio allocations within the objective guidelines. Rebalancing a portfolio will typically occur on an annual basis or no more frequent than deemed necessary.

The client, after consultation with the STLFAM representative, may participate in more than one model at a time. Asset Allocation strategies will be executed through Ceros Financial Services (NFS – National Financial Services Clearing Agent) Platform. Both transaction and non-transaction fee no-load funds will be utilized.

### **Asset Allocation Models**

Growth Asset Allocation Model is the highest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. This model is invested directly in equity securities at all times or in equity securities and fixed income securities through variable sub accounts. Percentages of investments are allocated to international, growth & Income, large-cap growth, large-cap value, mid-cap growth, mid-cap value, small-cap growth,

small-cap value, or additionally within corporate investment grade and U.S. Government fixed income securities. The allocated percentages are tailored periodically to adjust to market volatility and align model objectives. The value and growth management styles are as defined by Morningstar, Inc. In order to remain consistent with the asset allocation, each portfolio will be reviewed on a quarterly basis and rebalanced.

Total Return Asset Allocation is the middle risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. This model is invested directly in equity securities and fixed income securities at all times or in equity securities and fixed income securities through variable annuity sub accounts. Percentages of investments are allocated to international, growth & income, large-cap growth, large-cap value, mid-cap growth, mid-cap-value, small-cap growth, small-cap value, and additionally within corporate investment grade and U.S. Government fixed income securities. The allocated percentages are tailored periodically to adjust to market volatility and align model objectives. The value and growth management styles are as defined by Morningstar, Inc. In order to remain consistent with the asset allocation, each portfolio will be reviewed on a quarterly basis and rebalanced.

Balanced Asset Allocation model is the lowest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. This model is invested directly in equity securities and fixed income securities at all times or in equity securities and fixed income securities through variable annuity sub accounts. Percentages of investments are allocated to international, growth & income, large-cap growth, large-cap value, mid-cap growth, mid-cap value, small-cap growth, small-cap value, and additionally within corporate investment grade and U.S. Government fixed income securities. The allocated percentages are tailored periodically to adjust to market volatility and align model objectives. The value and growth management styles are as defined by Morningstar, Inc. In order to remain consistent with the asset allocation, each portfolio will be reviewed on a quarterly basis and rebalanced.

### **Utilized by Timothy Hunt**

STLFPAM also provides active management services under the Full Discretion Advisory Agreement whereas the Client appoints and provides STLFPAM with general power of attorney to allow STLFPAM to undertake such investment supervisory services as STLFPAM deems appropriate for the Client in one or more management programs or mutual funds. Client appoints STLFPAM to select management program(s), third party manager(s), and program signal, appoint sub-advisors, and from time to

time reallocate funds among such program(s) and/or third-party manager(s) according to clients predetermined risk and objectives. STLFAM effectuates buys/sells on a discretionary basis.

Income Portfolio model is used to seek both current income and modest growth of capital from a portfolio of both fixed and income securities and equity securities. A portfolio of corporate bonds, US Government obligations, income producing securities, equities, exchange traded funds (ETF's), no-load and NAV load mutual funds are used.

Dynamic Asset Allocation Model seeks growth of capital with an emphasis on controlling risk through the use of multiple asset classes and the implementation of proprietary technical indicators and fundamentally driven portfolios. The Dynamic Allocation Model will utilize multiple strategies of long and intermediate term active portfolio management programs. The model employs an Asset Class Rotation strategy that buys indexed asset classes exhibiting relative strength; Tactical strategies that can seek the safety of money market when support, resistance and trend following models dictate; fixed income strategies; hedging strategies; and other strategies including but not limited to a momentum and contrarian model that utilizes sector rotation. Variable annuities utilize mutual funds and index funds (separate accounts).

Asset Class Rotation Model's objective is the growth of capital through the purchase of various indexed groups of equities called asset classes. The investment vehicles rely on fundamental analysis to determine the weighting of the individual equities in their portfolio. Through the utilization of long and intermediate term strategies, we monitor the asset classes daily and rotate into the investment style exhibiting relative strength. To control risk we rank each asset class based on relative strength performance utilizing proprietary technical indicators and seek to rotate out of the weakest and into the strongest asset classes. Unlike the Dynamic Asset Allocation strategy, the Asset Class Rotation strategy will not exit position into the money market, but rather remain fully invested.

Variable Annuity (Sub accounts) Models:

Growth Asset Allocation Model is the highest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. This model is invested directly in equity securities at all times or in equity securities and fixed income securities through variable sub accounts. Percentages of investments are allocated to international, growth & Income, large-cap growth, large-cap value, mid-cap growth, mid-cap value, small-cap growth, small-cap value, or additionally within corporate investment grade and U.S. Government fixed income securities. The allocated percentages are

tailored periodically to adjust to market volatility and align model objectives. The value and growth management styles are as defined by Morningstar, Inc. In order to remain consistent with the asset allocation, each portfolio will be reviewed on a quarterly basis and rebalanced.

Total Return Asset Allocation is the middle risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. This model is invested directly in equity securities and fixed income securities at all times or in equity securities and fixed income securities through variable annuity sub accounts. Percentages of investments are allocated to international, growth & income, large-cap growth, large-cap value, mid-cap growth, mid-cap-value, small-cap growth, small-cap value, and additionally within corporate investment grade and U.S. Government fixed income securities. The allocated percentages are tailored periodically to adjust to market volatility and align model objectives. The value and growth management styles are as defined by Morningstar, Inc. In order to remain consistent with the asset allocation, each portfolio will be reviewed on a quarterly basis and rebalanced.

Balanced Asset Allocation model is the lowest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. This model is invested directly in equity securities and fixed income securities at all times or in equity securities and fixed income securities through variable annuity sub accounts. Percentages of investments are allocated to international, growth & income, large-cap growth, large-cap value, mid-cap growth, mid-cap value, small-cap growth, small-cap value, and additionally within corporate investment grade and U.S. Government fixed income securities. The allocated percentages are tailored periodically to adjust to market volatility and align model objectives. The value and growth management styles are as defined by Morningstar, Inc. In order to remain consistent with the asset allocation, each portfolio will be reviewed on a quarterly basis and rebalanced.

#### Mutual Fund Accounts:

Aggressive Growth Asset Allocation model is the highest-risk return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 100% directly must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 100%. In order to reduce the correlation of the Clients holdings to the U.S. stock

markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation compared to investing in only U.S. Securities. The equity portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar, Inc.

Growth Asset Allocation model is the second to highest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 70%-90% in equity securities and 10%-30% in fixed income securities depending on the portfolio objective. This is done directly in equity securities and fixed income securities or in equity securities and fixed income securities through mutual funds. In order to reduce the correlation of the Clients holdings to the U.S. Stock markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation in the amount of 10%-20% of the all-equity model. The equity portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar, Inc. The balance of this model is invested in U.S. and global government fixed income securities, corporate investment grade, and emerging market fixed income.

Moderate Growth Asset Allocation model is the next to the lowest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 50%-70% in equity securities and 30%-50% in fixed income securities depending on the portfolio objective. This is done directly in equity securities and fixed income securities or in equity securities and fixed income securities through mutual funds. In order to reduce the correlation of the Clients holdings to the U.S. Stock markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation in the amount of 30%-40% of the all-equity model. The equity portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar

Conservative Growth Asset Allocation is the lowest risk-return model. The client must recognize that the objectives of this model cannot be achieved without incurring a certain amount of principal volatility. The objective of this model is to invest 10%-30% in equity securities and 70%-90% in fixed

income securities depending on the portfolio objective. This is done directly in equity securities and fixed income securities or in equity securities and fixed

income securities through mutual funds. In order to reduce the correlation of the Clients holdings to the U.S. Stock markets, this model has exposure to international and emerging market stocks to seek a reduction in overall portfolio standard deviation in the amount of 50%-60% of the all-equity model. The equity portion is typically diversified in large capitalization and small capitalization issues among the value-growth spectrum utilizing both domestic and international equity mutual funds. The value and growth management styles are as defined by Morningstar, Inc. The balance of this model is invested in U.S. and global government fixed income securities, corporate investment grade, and emerging market fixed income.

In order to remain consistent with the asset allocation and portfolio holdings, each model will be reviewed and monitored on a monthly basis. Rebalancing will be utilized in order to keep the portfolio allocations within the objective guidelines. Rebalancing a portfolio will typically occur on an annual basis or no more frequent than deemed necessary.

The client, after consultation with the STLFPAM representative, may participate in more than one model at a time. Asset Allocation strategies will be executed through Ceros Financial Services (NFS – National Financial Services Clearing Agent) Platform. Both transaction and non-transaction fee no-load funds will be utilized.

### Risk of Loss

Because our strategies invest in equity securities, there naturally exists a risk of loss based on market conditions. In addition to lowering that risk and volatility through the use of income producing fixed instruments, we also take a different approach to manage risk. Our Dynamic Asset Allocation strategies will also exit 100% to U.S. Treasury Money Market by selling its equity holdings when our discipline issues a sell signal. These defensive measures seek to minimize the risk of investing in the stock market.

The Income Portfolio purchases individual securities, there always exist the risk of unexpected developments that can affect the value of the securities, such as unexpected losses, reduced earnings projections, adverse changes to market conditions, and a whole myriad of other market factors that can cause downward pressure on the price of individual securities, which in turn can result in loss of value in a short period of time.

## **Item 9 Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

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

The Principals of STLFPAM are licensed as registered representatives of Ceros Financial Services, a licensed broker/dealer with FINRA, SEC, and various regulatory agencies. As a result, varying conflicts of interest may arise. STLFPAM's investment adviser representatives are registered with Ceros Financial Services to sell investment products and therefore, receive commissions. Unless under an usual scenario with the approval of the Chief Compliance Office (CCO), Advisor Representatives do not sell commission based investments. Representatives do recommend that clients implement investment advice through Ceros Financial Services. It is estimated the officers will spend 80% of their time supervising investment advisor activities and products and 20% of their time selling securities and investment products.

The Principal Executive Officers of STLFPAM are also Principal Executive Officers of St. Louis Financial Planners, Inc., a financial planning and registered investment adviser. St. Louis Financial Planners, Inc. and STLFPAM share the same office space.

Representatives of STLFPAM also sell life insurance, long term care insurance and annuities through Brokerage Unlimited and The Blair Agency for which they receive a commission. Representatives sell cd's through EverBank and a commission is paid.

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

This Code establishes rules of conduct for all employees of STLFPAM and is designed to protect, among other things, the confidentiality of client information and establish compliance procedures ensuring best practices. The Code is based upon the principal that STLFPAM and its employees owe a fiduciary duty to their clients to conduct their affairs as to avoid (i) serving their own personal interests ahead of clients, including their personal securities transactions, in such a manner as to avoid serving their own personal interests ahead of clients, (ii) not taking inappropriate advantage of their position with the firm and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The Code is designed to ensure that the high ethical standards are maintained by STLFPAM continue to be applied. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The excellent name and reputation of our firm continues to be a direct reflection of the conduct of each employee.

STLFPAM and its employees are prohibited from engaging in fraudulent, deceptive or manipulative conduct. Compliance with this section involves more than acting with honesty and good faith alone. It means that STLFPAM has an affirmative duty of utmost good faith to act solely in the best interest of its clients.

STLFPAM and its employees are subject to the following specific fiduciary obligations when dealing with clients:

- The duty to have a reasonable, independent basis for the investment advice provided.
- The duty to obtain best execution for a client's transactions where the Firm is in a position to direct brokerage transactions for the client.
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs and circumstances.
- A duty to be loyal to clients.

In meeting its fiduciary responsibilities to its clients, STLFPAM expects every employee to demonstrate the highest standards of ethical conduct

for continued employment. Strict compliance with the provisions of the Code shall be considered a basic condition of employment. STLFPAM's reputation for fair and honest dealings with its clients has taken considerable time to build. This standing could be seriously damaged as the result of even a single



securities transaction being considered questionable in light of the fiduciary duty owed to our clients.

A copy of STLFPAM's Code of Ethics is available upon request.

## **Item 12 Brokerage Practices**

The client in its advisory agreement with STLFPAM grants to STLFPAM or designated sub-advisor discretionary authority over the account with regard to the securities to be bought or sold in the account and the amount of the securities to be bought or sold.

STLFPAM has chosen Ceros Financial Services as their broker/dealer based upon its determination of capable execution, reasonable commissions, and selection of appropriate mutual funds. If any product, research or services are provided to STLFPAM, such are used to service and benefit all client accounts. STLFPAM suggestion of a broker-dealer and/or mutual fund distribution company is undertaken by STLFPAM to attempt to obtain the best price and execution, but STLFPAM cannot guarantee that STLFPAM's suggestions will result in the best price and execution. STLFPAM's investment adviser representatives are registered representatives with Ceros Financial Services. Often STLFPAM's representatives recommend that clients implement investment advice through Ceros Financial Services. STLFPAM believes that Ceros offers a full range and quality of broker services including execution capability, commission rates, and financial responsibility. To the extent that STLFPAM may benefit from clients implementing investment advice through Ceros, a potential conflict of interest may arise. STLFPAM does, however, reserve the right to recommend other broker-dealers and/or mutual fund distribution companies.

STLFPAM utilizes Orion as an independent source of data gathering and report generation. There is no additional cost to clients for this service. STLFPAM receives a benefit in the form Ceros paying the price of postage for mailing of the quarterly statements. STLFPAM receives a benefit for the cost of the initial development of its internet website, as well as ongoing monthly maintenance fees from Ceros Financial Services. Clients should be aware that such arrangements with Ceros could present a potential conflict of interest.

STLFPAM compensates representatives of St. Louis Financial Planners, Inc. for clients utilizing their service. This referral arrangement does not result in any additional charge or fee to the client from STLFPAM.

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

All accounts will be reviewed on a daily basis. Individual investments will be monitored continuously and reviewed weekly or more frequently if necessary. Overall account positions will be reviewed on a quarterly basis to determine their ability to meet client goals and objectives. Actions that may trigger changes in accounts include, but are not limited to, relevant financial events, market activity or indicators from STLFPAM's proprietary technically derived signals.

Individual funds, annuities, and fund groups selected by clients are reviewed periodically by principals of STLFPAM. If investment policies of any investment vehicle become inappropriate for the STLFPAM's management program, clients are advised.

In addition to regular audit procedures performed by administrative staff or outside services, reviews may be conducted by officers of STLFPAM and designated employees. Currently that includes, Tim, Dan, and Casey Hunt. Accounts will be reviewed for performance, client objectives and matching accuracy of all account balances, as well as, reviewing client's current objectives. There are no assignment limits for any associate of STLFPAM.

In addition to the monthly and/or quarterly reports provided by the custodian of the account, clients will receive quarterly statements showing aggregate market value of the account and annual performance reports. Clients are urged to carefully compare the statements they receive from STLFPAM and the custodian and contact STLFPAM if they have any questions. A market report discussing general market conditions and management viewpoint will be sent as advisers feel necessary.

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

St. Louis Financial Planners, Inc. refers clients to STLFPAM for discretionary advisory services. STLFPAM advisers will provide portfolio management, selection of other advisers, and active management service.

### **Item 15 Custody**

STLFPAM does not have custody of client's accounts. The custodian for client accounts is primarily National Financial Services and various mutual funds and insurance companies.

### **Item 16 Investment Discretion**

The client in its advisory agreement with STLFPAM, grants to STLFPAM or designated sub-advisor discretionary authority over the account to place trades in the account without contacting the client prior to each trade to obtain the clients permission. Our discretionary authority includes the ability to determine the security to buy or sell and to determine the amount of the security to buy or sell. Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

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

STLFPAM does not have the authority to vote client securities. Clients will receive their proxies or other solicitations directly from their custodian or fund. Clients may contact STLFPAM regarding any solicitation they receive regarding their account.

### **Item 18 Financial Information**

STLFPAM does not require or solicit prepayment of fees.

STLFPAM has not been the subject of a bankruptcy petition at any time.

## **Item 19 Requirements for State Registered Advisers**

The Principals of STLFPAM and their education and business background are as follows:

Timothy D. Hunt – Attended University of Missouri from 1976- 1979. Received CFP® Certification from the College of Financial Planning in 2005. Secretary and Owner of St. Louis Financial Planners, Inc. since 1980. President and Owner of St. Louis Financial Planners Asset Management LLC since 1996. Registered Representative of Ceros Financial Services, Inc. since Jan. 2010, previously with Girard Securities, Inc from 2002-2009. Registered Representative of Spelman & Co., Inc. 1998- 2002. Tim holds a series 7, 31, 63, 65, and 99 licenses.

Daniel E. Hunt – High School Diploma from Ritenour High School 1969. Vice-President and Owner of St. Louis Financial Planners, Inc. since 1975. Vice-President and Owner of St. Louis Financial Planners Asset Management LLC since 1996. Registered Representative of Ceros Financial Services, Inc. since 2010, previously with Girard Securities, Inc. from 2002-2009. Registered Representative of Spelman & Co., Inc. 1998-2002. Dan holds a series 7, 31, 63, 65, and 99 licenses.

Casey Hunt – Bachelor Degree in Finance from University of Illinois 1996. CFP® Certification from the College of Financial Planning in 2004. Treasurer and Owner of St. Louis Financial Planners, Inc. since 1997. Chief Compliance Officer since 2004 for St. Louis Financial Planners, Inc. and St. Louis Financial Planners Asset Management LLC. Owner of St. Louis Financial Planners Asset Management LLC since 1997. Registered Representative of Ceros Financial Services, Inc. since Jan. 2010, previously with Girard Securities, Inc. from 2002-2009. Registered Representative of Spelman & Co., Inc. 1998-2002. Casey holds a series 7, 24, 66 and 99 licenses.

### **Client Complaints:**

Edward & Susan McMurry filed a complaint against Daniel E. Hunt, Spelman & Co., Inc, St. Louis Financial Planners Asset Management LLC., and STLFP on 4/26/2006 Client alleged breach of contract, negligence, breach of fiduciary duty, unsuitability, failure to supervise, unjust

enrichment and fraud. Docket number 06-02289. Client was seeking \$379,000 and the claim was settled for \$22,500 on 12/7/2006. Settlement should not be deemed an admission of guilt or liability.

William & Sharon Lifritz filed a complaint against Daniel E. Hunt, Spelman & Co., Inc., St. Louis Financial Planners Asset Management LLC., and STLFP on 3/30/2004. Docket number 04-01548. Client alleged negligence, breach of fiduciary duty in not providing sound and conservative financial advice resulting in financial damages. Client was seeking \$100,000 and the claim settled for \$35,000 plus \$975 of the NASD filing fee on 6/21/2005. Settlement should not be deemed an admission of guilt or liability.

Lawrence Deptula filed a complaint against Timothy Hunt, Spelman & Co. Inc., St. Louis Financial Planners Asset Management LLC, and STLFP on 11/24/03 alleging representative failed to follow his instructions from August 2001 to move his accounts to money market, customer alleges his accounts were not moved to money market until September 22, 2001. Docket number NASD 03-06270. Same client previously submitted this claim on 1/28/02 and was denied by former broker/dealer legal counsel due to lack of factual evidence/proof to support allegations. Claim was filed for \$63,981 in an effort to avoid further costs of litigation, parties have decided to settle the matter on 12/6/04 for the sum of \$32,500. Settlement should not be deemed an admission of guilt or liability.

Part 2B of form ADV: Brochure Supplement

Casey Hunt  
St. Louis Financial Planners Asset Management LLC  
1415 Elbridge Payne Rd. Ste. 140  
Chesterfield, MO 63017  
636-532-3900

5/9/2012

This brochure supplement provides information about Casey Hunt that supplements the St. Louis Financial Planners Asset Management LLC brochure. You should have received a copy of that brochure. Please contact Casey Hunt if you did not receive St. Louis Financial Planners Asset Management, LLC's brochure or if you have any questions about the contents of this supplement.

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

**Item 2 Educational Background and Business Experience**

Casey Hunt - Year of Birth 1973

Education:

University of Illinois 1996

Bachelor Degree in Finance

College of Financial Planning – 2004

Certified Financial Planner TM professional 2004

CFP designation requires completion and passing approved education program for CFP, passing CFP exam, three years qualifying full time work experience, passing fitness standard and background check, paying certification fee. To maintain certification thirty hours of continuing education is required every two years.

Business Experience:

St. Louis Financial Planners Asset Management LLC

1/1997 – Present

St. Louis Financial Planners, Inc.

1/1997 – Present

Ceros Financial Services, Inc.

1/1/2010- Present

Girard Securities, Inc.

9/2002 - 12/31/09

Spelman & Company, Inc.

1/1997 - 9/2002

### **Item 3 Disciplinary Information**

Casey Hunt has no reportable disciplinary history.

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

Casey Hunt is a registered representative of Ceros Financial Services, Inc.  
Casey Hunt sells life insurance and long term care insurance through Brokerage Unlimited, Inc. and the Blair Agency.

### **Item 5 Additional Compensation**

Casey Hunt receives 12b-1 distribution fees for mutual funds and annuities held at Ceros Financial Services. Clients should review all available prospectuses and/or contract information. Commissions are also received from life and long term care insurance sales.

### **Item 6 Supervision**

Timothy Hunt 636-532-3900

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

Casey has not been found liable in any arbitration claim, civil, self-regulatory, or administrative proceeding.

Casey Hunt has never been the subject of a bankruptcy petition.

Part 2B of form ADV: Brochure Supplement

Daniel E. Hunt  
St. Louis Financial Planners Asset Management LLC  
1415 Elbridge Payne Rd. Ste. 140  
Chesterfield, MO 63017  
636-532-3900

5/14/2012

This brochure supplement provides information about Daniel E. Hunt that supplements the St. Louis Financial Planners Asset Management LLC brochure. You should have received a copy of that brochure. Please contact Daniel E. Hunt if you did not receive St. Louis Financial Planners Asset Management, LLC's brochure or if you have any questions about the contents of this supplement.

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

**Item 2 Educational Background and Business Experience**

Daniel E. Hunt - Year of Birth 1951

Education:

Ritenour High School 1969

Daniel Hunt does not have any secondary education after high school.

Business Experience:

St. Louis Financial Planners, Inc.	1/1975 – Present
St. Louis Financial Planners Asset Management LLC	3/1996 - Present
Ceros Financial Services, Inc.	1/2010 – Present
Girard Securities, Inc.	9/2002 – 12/2009
Spelman & Company, Inc.	1/1988 - 9/2002

**Item 3 Disciplinary Information**



No disciplinary actions to disclose.

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

Daniel E. Hunt is a registered representative of Ceros Financial Services, Inc. Daniel E. Hunt sells life insurance and long term care insurance through Brokerage Unlimited, Inc.

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

Daniel E. Hunt receives 12b-1 distribution fees for mutual funds and annuities held at Ceros Financial Services. Sub-Advisor fees are received from Premier Wealth Advisory Services. Life Insurance and Long Term Care insurance commissions. Clients should review all available prospectus and/or contract information. Commissions are also received from life and long term care insurance sales.

#### **Item 6 Supervisor**

Chief Compliance Officer – Casey Hunt 636-532-3900

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

Edward & Susan McMurry filed a complaint against Daniel E. Hunt, Spelman & Co., Inc, St. Louis Financial Planners Asset Management LLC., and STLFP on 4/26/2006 Client alleged breach of contract, negligence, breach of fiduciary duty, unsuitability, failure to supervise, unjust enrichment and fraud. Docket number 06-02289. Client was seeking \$379,000 and the claim was settled for \$22,500 on 12/7/2006. Settlement should not be deemed an admission of guilt or liability.

William & Sharon Lifritz filed a complaint against Daniel E. Hunt, Spelman & Co., Inc., St. Louis Financial Planners Asset Management LLC., and STLFP on 3/30/2004. Docket number 04-01548. Client alleged negligence, breach of fiduciary duty in not providing sound and conservative financial advice resulting in financial damages. Client was seeking \$100,000 and the claim settled for \$35,000 plus \$975 of the NASD filing fee on 6/21/2005. Settlement should not be deemed an admission of guilt or liability.

Daniel Hunt has never been the subject of a bankruptcy petition.

Part 2B of form ADV: Brochure Supplement

Timothy D. Hunt  
St. Louis Financial Planners Asset Management LLC  
1415 Elbridge Payne Rd. Ste. 140  
Chesterfield, MO 63017  
636-532-3900

5/9/12

This brochure supplement provides information about Timothy D. Hunt that supplements the St. Louis Financial Planners Asset Management LLC brochure. You should have received a copy of that brochure. Please contact Timothy D. Hunt if you did not receive St. Louis Financial Planners Asset Management, LLC's brochure or if you have any questions about the contents of this supplement.

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

**Item 2 Educational Background and Business Experience**

Timothy D. Hunt - Year of Birth 1957

Education:

University of Missouri, Columbia, MO	1976- 1979
College of Financial Planning – 2005	Certified Financial Planner TM professional 2006

CFP designation requires completion and passing approved education program for CFP, passing CFP exam, three years qualifying full time work experience, passing fitness standard and background check, paying certification fee. To maintain certification thirty hours of continuing education is required every two years.

Business Experience:

St. Louis Financial Planners Asset Management LLC	3/1/96 – Present
St. Louis Financial Planners, Inc.	1/1980 – Present
Ceros Financial Services, Inc.	1/1/2010- Present

Girard Securities, Inc.  
Spelman & Company, Inc.

9/2002 - 12/31/09  
1/1988 - 9/2002

### **Item 3 Disciplinary Information**

No disciplinary information to disclose.

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

Timothy D. Hunt is a registered representative of Ceros Financial Services, Inc.  
Timothy D. Hunt sells life insurance and long term care insurance through Brokerage Unlimited, Inc. and CD's through EverBank.

### **Item 5 Additional Compensation**

Timothy D. Hunt receives 12b-1 distribution fees for mutual funds and annuities held at Ceros Financial Services. Clients should review all available prospectus and/or contract information. Commissions are also received from life and long term care insurance sales.

### **Item 6 Supervisor**

Chief Compliance Officer – Casey Hunt 636-532-3900

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

Lawrence Deptula filed a complaint against Timothy Hunt, Spelman & Co. Inc., St. Louis Financial Planners Asset Management LLC, and STLFP on 11/24/03 alleging representative failed to follow his instructions from August 2001 to move his accounts to money market, customer alleges his accounts were not moved to money market until September 22, 2001. Docket number NASD 03-06270. Same client previously submitted this claim on 1/28/02 and was denied by former broker/dealer legal counsel due to lack of factual evidence/proof to support allegations. Claim was filed for \$63,981 in an effort to avoid further costs of litigation, parties have decided to settle the matter for the sum of \$32,500 on 12/6/04. Settlement should not be deemed an admission of guilt or liability

Timothy Hunt has never been the subject of a bankruptcy petition.