

McCormack Financial Planning, Inc.

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This brochure provides information about the qualifications and business practices of McCormack Financial Planning, Inc. If you have any questions about the contents of this Brochure, please contact us at (404) 236-7316 and/or Barbara@McCormackfp.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.

Additional information about McCormack Financial Planning, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for McCormack Financial Planning, Inc. is 136857.

Any references to McCormack Financial Planning, Inc. as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.

Item 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Generally, McCormack Financial Planning, Inc. will notify clients of material changes on an annual basis. However, where we determine that an interim notification is either meaningful or required, we will notify our clients promptly. In either case, we will notify our clients in a separate document.

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Item 4 Advisory Business

McCormack Financial Planning, Inc. (hereinafter referred to as "MFP") is an investment advisory firm offering a variety of advisory services customized to your individual needs.

A. MFP was established in August of 2005. MFP is wholly owned by Barbara Miner McCormack, President.

B. MFP offers the following advisory services. Each of the services is more fully described below.

- Asset Management - assets will receive continuous and ongoing asset management through a wrap fee program.
- Financial Planning
- Assets under Advisement - assets will receive periodic asset allocation services
- Analysis, Recommendation and Monitoring of Third Party Managed Programs

Asset Management Services

We provide asset management services on a wrap fee basis in accordance with our asset management wrap fee program (the "Program"). The services offered under, and the corresponding terms and conditions pertaining to, the Program are discussed in the Program brochure (the "Brochure"). Under the Program, we offer participants discretionary asset management services, for a single specified annual Program fee, inclusive of trade execution, custody, reporting, and investment management fees. The terms and conditions for your participation in the Program are set forth in detail in the Brochure, which is presented to all prospective Program participants in accordance with the disclosure requirements of Appendix 1 to Form ADV Part 2A. All prospective Program participants should read this disclosure statement and the Brochure, and ask any corresponding questions that they may have prior to participation in the Program.

As indicated in the Brochure, the overall cost of participation in the Program may cost more or less than purchasing such services separately.

Financial Planning Services

Depending on your needs and complexity of your situation, financial planning services will either involve an analysis of your financial situation and recommendations for a course of action or on a consultative basis.

Financial Planning services involving analysis of your financial situation include a written presentation of your objectives and goals, a summary of significant events occurring during the planning period and an overview of your financial goals and objectives. The written analysis or plan will provide a series of illustrations and hypothetical scenarios to assist you in determining the potential of realizing each goal or where there may be deficiencies. Additionally, the written analysis will include recommendations outlining steps to consider in working toward your financial goals and objectives.

Consultative arrangements or sessions are used for isolated financial situations or when limited advice and analysis is needed for a particular area of your financial situation. Generally, consultative arrangements will not be utilized until you have participated in a financial plan analysis.

Plans are based on your financial situation at the time and are based on financial information disclosed by you to MFP. You are advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. MFP cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review the plan and update the plan based upon changes in your financial situation, goals, or objectives or changes in the economy. Should your financial situation or investment goals or objectives change, you must notify MFP promptly of the changes. You are advised that the

advice offered by MFP may be limited and is not meant to be comprehensive. Therefore, you may need to seek the services of other professionals such as an insurance adviser, attorney and/or accountant.

You are not obligated to implement advice through MFP or Advisory Representatives. Should you implement the plan with MFP's Advisory Representatives commissions or other compensation may be received in addition to the advisory fee paid to MFP.

Assets Under Advisement

If you have accounts for which MFP is not able to offer its management services, you may obtain asset allocation advice from MFP. The frequency of the advice will be solely depending on your ability to provide MFP with current and accurate account information. Preferably, MFP should be given duplicate statements or not less than quarterly statements. MFP will monitor your account on a periodic and not on continuous and ongoing, basis.

MFP will provide you with asset allocation recommendations. Implementation of the advice and execution of the transactions is solely your responsibility. MFP and its advisory representatives will not participate in the implementation of the advice.

Based on the information gathered from you, MFP will provide you with a written asset allocation recommendation. The recommendations offered by MFP will be limited to those securities available in your account.

Analysis, Recommendation and Monitoring of Third Party Managed Programs

MFP will locate a manager that MFP believes suitable to provide asset management services based on your financial situation. MFP has entered into a relationship to refer clients to Lockwood Investment Management..

MFP will provide the following services:

1. Evaluate your financial situation and recommend one or more managers.
2. Assist you with completion of any paperwork to establish the account and relationship with the managers.
3. Monitor the performance of the manager and your account. If needed, make recommendations to changes to the management of your account or your financial profile.
4. Review your quarterly statements.
5. Meet with you at least quarterly to discuss your account, update your financial profile, review your suitability information (i.e. risk tolerance, investment objectives, etc.). At our annual meeting we will also review property and casualty insurance, life insurance, long term care insurance, mortgage, etc. More frequent meetings will be provided upon your request.

MFP will not participate in the direct management of the account and will not be involved in the execution of any securities transactions. Management of the account will be under the selected third party manager(s).

General Information

You are advised the investment recommendations and advice offered by MFP are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform MFP promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify MFP of any such changes could result in investment recommendations not meeting your needs.

MFP tailors the advisory services it offers to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities. You must provide these restrictions/limitations to our firm in writing.

MFP will gather various information about you and your financial situation through personal interviews and the use of a data gathering form. You should expect to participate in at least two to three meetings. Depending on the services you have requested, MFP will gather various financial information and history from you including, but not limited to:

- Retirement and financial goals
- Investment objectives
- Investment horizon
- Financial needs
- Cash flow analysis
- Cost of living needs
- Education needs
- Savings
- Other applicable financial information required by MFP in order to provide the investment advisory services requested.
- Financial Position
- Estate Planning
- Insurance Risk (including long term care)

We provide investment advice through a wrap fee program as well as on non-wrap accounts. Wrap fee program assets are managed on an ongoing and discretionary basis. The advice we render on non-wrap accounts is provided on a periodic basis whereby we make recommendations to clients and it is the clients responsibility to implement any advice we provide.

Assets Under Management

As of March 7, 2012, we have approximately \$39,763,434 million of client assets under our discretionary management through our wrap fee program..

Item 5 Fees and Compensation

Compensation for the Sale of Securities or Other Investment Products

Persons providing investment advice on behalf of our firm are registered representatives with Cape Securities, Inc. ("Cape"), a securities broker-dealer, and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. In their capacity as registered representatives, these persons will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by these persons in their capacities as registered representatives is separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs. When appropriate, we may recommend the purchase of "no-load" funds. You are under no obligation, contractually or otherwise, to purchase securities products through any person affiliated with our firm.

Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

Financial Planning Services

You are advised that fees for planning services are strictly for planning services. Therefore, you may pay fees and/or commissions for additional services obtained such as asset management or products purchased such as securities or insurance.

Fees are negotiable. Your fees will be dependent on several factors including time spent with MFP, number of meetings, complexity of your situation, amount of research, services requested and staff resources.

A fee will be quoted to you and the fee will be agreed upon prior to the initiation of any services. One-half (50%) of the quoted fee will be due to MFP upon execution of the Advisory Agreement with MFP. The balance is due upon presentation of the recommendations.

<u>Fee Schedule</u>	<u>Maximum Fee</u>
Initial Comprehensive Financial Plan	
Single	\$3,500 to \$6,500
Married	\$7,000 to \$15,000
Limited Scope Financial Plan	
Single	\$1,500
Married	\$3,000
Single - Incentive Stock Option	\$1,500
Single - Advanced Estate Planning	\$1,000
Married Incentive Stock Option	\$1,500
Married Advanced Estate Planning	\$3,000
Separate Spousal Assets	\$1,000
Children (with personal assets & investments)	\$1,000
Children (without assets & investments)	\$500
Hourly fees for Consultations	\$400

Termination Provisions

You may terminate advisory services obtained from MFP, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with MFP. Thereafter, you may terminate investment advisory services upon delivery of written notice to MFP. You will be responsible for any time spent by MFP calculated using the hourly rate of \$400. If you prepaid fees, any refund will be calculated based on time spent times the hourly rate of \$400.

Assets Under Advisement

The initial fee will be prorated from the date of execution of the Advisory Agreement (referred to as the "anniversary date") to December 31. The initial fee will be calculated based on the value of assets under advisement as of the date of execution of the Advisory Agreement. One quarter of the fee will be due in advance of each calendar quarter. The initial fee will be due upon execution of the Advisory Agreement. Thereafter, each annual fee will be calculated on value of the assets under advisement as of December 31 of each year. One-quarter of the fee will be due in advance of each calendar quarter to be paid directly to the firm on receipt of an invoice and based on the negotiable fee schedule below.

Account Value		Maximum Client Fee
From	To	
\$0	\$50,000	2.20%
\$50,001	\$100,000	2.00%
\$100,001	\$250,000	1.75%
\$250,001	\$500,000	1.50%
\$500,001	\$1,000,000	1.25%
\$1,000,001	and higher	1.00%

Termination Provisions

You may terminate advisory services obtained from MFP, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with MFP. Thereafter, you may terminate investment advisory services upon delivery of written notice to MFP. Should termination occur during a calendar quarter, you will be issued a prorated refund from the date of receipt of the written notice to terminate to the end of the calendar quarter.

Analysis, Recommendation and Monitoring of Third Party Managed Programs

You will pay an advisory fee to the third party manager. The third party manager's fees are disclosed in the third party manager's Disclosure Brochure. MFP will provide you a copy of the third party manager's Disclosure Brochure.

MFP's compensation will be a portion of the advisory fee charged by the third party manager. Therefore, MFP has an interest in you selecting a third party manager recommended by MFP.

MFP will receive 1% Clients will not pay more than 1.88% for the services of MFP and the third party manager.

Item 6 Performance-Based Fees and Side by Side Management

We do not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Our fees are calculated as described in the *Advisory Business* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 Types of Clients

MFP's services are geared toward individuals both high net worth (i.e. clients with a net worth of \$1,500,000) and other than high net worth and small Businesses.

MFP does not impose minimum account size requirements. However, if you are participating in third party managed programs, the third party managers may impose minimum account size requirements. Disclosure of a third party manager's minimum account size requirement is disclosed in their Disclosure Brochure.

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

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

Charting Analysis - involves the gathering and processing of price and volume pattern information for a particular security, sector, broad index or commodity. This price and volume pattern information is analyzed. The resulting pattern and correlation data is used to detect departures from expected performance and diversification and predict future price movements and trends.
Risk: Our charting analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Fundamental Analysis - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

Risk: The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Cyclical Analysis - a type of technical analysis that involves evaluating recurring price patterns and trends. Economic/business cycles may not be predictable and may have many fluctuations between long term expansions and contractions.

Risk: The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Technical Analysis - involves studying past price patterns, trends, and interrelationships in the financial markets to assess risk-adjusted performance and predict the direction of both the overall market and specific securities.

Risk: The risk of market timing based on technical analysis is that our analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Long-Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Risk: Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

MFP investment management philosophy is long term (i.e. purchases of securities held at least a year). However, MFP will monitor portfolio holdings and if there are concern factors, MFP may determine to not continue to maintain the position in your portfolio. Factors that may result in a change include but are not limited to, economic factors, management changes with the security, tax law changes, objective change, and news or press releases.

MFP primarily provides advice on individual equities, writing covered call options, bonds, open-ended mutual funds and uses institutional and no-load and load waived or mutual funds purchased at net asset value (NAV), and exchange traded funds (ETFs).

Stocks: There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to: the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and, the overall health of the economy. In general, larger, more well established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

Bonds: Corporate debt securities (or "bonds") are typically safer investments than equity securities, but their risk can also vary widely based on: the financial health of the issuer; the risk that the issuer might default; when the bond is set to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same rate of return.

Covered Call Options: The covered call is a strategy in which an investor writes a call option contract while at the same time owning an equivalent number of shares of the underlying stock. If this stock is purchased simultaneously with writing the call contract, the strategy is commonly referred to as a "buy-write." If the shares are already held from a previous purchase, it is commonly referred to an "overwrite." In either case, the stock is generally held in the same brokerage account from which the investor writes the call, and fully collateralizes, or "covers," the obligation conveyed by writing a call option contract.

Mutual Funds and ETFs: Mutual funds and exchange traded funds (ETFs) are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. Exchange traded funds differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

Additional risks with mutual funds are:

- **Manager Risk:** which is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.
- **Market Risk:** which is the risk that the Stock Market will decline, decreasing the value of the securities contained within the mutual funds we recommend to you.
- **Industry Risk:** which is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.
- **Inflation Risk:** which is the risk that the rate of price increases in the economy deteriorates the returns associated with the mutual fund.
- **Political and Economic Risk.**

ETFs trade on an auctionable market. Therefore, there is more price fluctuation with ETFs than with mutual funds since ETFs trade throughout the day, whereas mutual funds are priced once a day. Also, since most ETFs only mirror a market index, such as the S&P 500, they won't outperform the index.

Analysis of Third Party Managers

This analysis includes a review of the following characteristics: ownership, asset allocation methodology, investment selection methodology, past performance, cost to client, attention to compliance issues, marketing and support ability, computer technology, client disclosure reporting and research capabilities. MFP Principals make personal due Diligence visits to third Party Managers .

Tax Considerations

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you consult with a tax professional prior to and throughout the investing of your assets.

As a result of revised IRS regulations, custodians and broker-dealers will begin reporting the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will default to the FIFO (First-In First-Out) accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Item 9 Disciplinary Information

There is no reportable disciplinary information required for MFP or its management persons that is material to your evaluation of MFP, its business or its management persons.

Item 10 Other Financial Industry Activities and Affiliations

A. As previously stated, Advisory Representatives are dually registered as advisory representatives of MFP and as registered representatives of Cape. You are under no obligation to purchase or sell securities through your Advisory Representative. However, if you choose to implement the plan, commissions may be earned in addition to any fees paid for advisory services. Commissions may be higher or lower at Cape than at other broker/dealers.

Under the rules and regulations of FINRA, Cape has an obligation to perform certain supervisory functions regarding certain activities engaged in by advisory representatives who are also registered representatives of Cape. For such supervisory functions, MFP may pay Cape a portion of the advisory fees they receive. Cape and MFP are not affiliated.

B.,C. MFP is not and does not have a related person who is a: futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. Further, MFP is not and does not have a related person who is: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; lawyer or law firm; insurance company or agency; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

MFP attempts to mitigate the conflicts of interest with the potential receipt of commissions if recommendations are implemented by providing you with these disclosures. Further, you are encouraged to consult other professionals and may implement recommendations through other financial professionals. Furthermore, as registered representatives with Cape, Advisory Representatives are subject to a supervisory structure at Cape for their securities business.

D. As stated under Item 4, *Advisory Business* above, MFP recommends other investment advisers (i.e. third party managers) and will receive a portion of the fee charged to you by the investment adviser. Since MFP has an interest in the compensation this is considered a material conflict of interest. MFP selects third party managers based on several criteria including cost, type of management, past history, ability to meet a need and provide a unique service. Since the fee charged to you is based on the value of your portfolio, all parties have an incentive to work toward performance goals and objectives. Consequently, if the third party manager does not adequately manage your account and the value of your portfolio goes down, so does the third party manager's and MFP's compensation.

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

Code Of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

Participation or Interest in Client Transactions

Neither our firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Personal Trading Practices

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account recommendations in the purchase or sale of securities.

Item 12 Brokerage Practices

As previously stated, Advisory Representatives are registered representatives of Cape. As a result they are subject to FINRA Conduct Rule 3040 which may restrict them from conducting securities transactions away from Cape unless Cape provides them with written authorization. MFP has entered into a relationship with Pershing Advisory Services ("Pershing"). Pershing Advisory Services is a wholly owned subsidiary of Pershing, LLC. MFP is independently owned and operated and not affiliated with Pershing or Cape.

You are advised that not all investment advisers require you to maintain accounts at a specific broker/dealer. You are advised you may maintain accounts at another broker/dealer. However, the services provided by MFP will be limited to only advice and will not include implementation. If you select another brokerage firm for custodial and/or brokerage services you will not be able to receive asset management services from MFP.

We believe that Pershing provides quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by Pershing, including the value of the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm. In recognition of the value of the services Pershing provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

Cape has a wide range of approved securities products for which Cape performs due diligence prior to selection. Cape's registered representatives are required to adhere to these products when implementing securities transactions through Cape. Commissions charged for these products may be higher or lower than commissions you may be able to obtain if transactions were implemented through another broker/dealer. Cape also provides Advisory Representatives, and therefore MFP, with back-office operational, technology, and other administrative support. Other services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. Such services are intended to help Advisory Representatives and MFP manage and further develop its business enterprise.

Pershing also makes available to MFP other products and services that benefit MFP but may not directly benefit you. Some of these other products and services assist MFP with managing and administering your accounts. These include software and other technology that provide access to your account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data; facilitate payment of MFP's fees from your accounts; and assist with back-office functions; recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of MFP's accounts, including accounts not that may not be held through Pershing.

For Wrap Fee Program clients, MFP may aggregate ("bunch") transactions in the same security on behalf of more than one client in an effort to strive for best execution. Please refer to our wrap fee program brochure for further details.

Item 13 Review of Accounts

A. If you are participating in the third party asset management programs or the Assets Under Advisement Program, we will monitor your assets on a periodic basis (usually quarterly) and you will be invited to participate in at least an annual review. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Your Advisory Representative will monitor for changes or shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested, and market shifts and corrections.

If you are participating in Financial Planning Services you will receive regular reviews. MFP recommends you have at least an annual review and update to any plans. However, the time and frequency of the reviews is solely your decision. Additionally, you will be charged review fees based on the fee schedule disclosed under the program.

The following individuals conduct reviews:

- Barbara McCormack, President
- Linda Kuehn, Vice President

B. You are advised that you must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require them to review the portfolio allocation and make recommendations for changes.

C. You will be provided statements at least quarterly direct from the account custodian. Additionally, you will receive confirmations of all transactions occurring direct from the account custodian. At least annually when you attend the annual review, MFP will provide you with a consolidated report of your managed account. You should compare the report with statements received direct from the account custodian. Should there be any discrepancy the account custodian's report will prevail.

Item 14 Client Referrals and Other Compensation

A. Product vendors recommended by MFP may provide monetary and non-monetary assistance with client events, provide educational tools and resources. MFP does not select products as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. MFP's due diligence of a product does not take into consideration any assistance it may receive. Therefore, this is not considered a conflict of interest but a benefit for you and MFP.

B. MFP does not directly or indirectly compensate any person who is not a supervised person of MFP for referrals.

Item 15 Custody

With the exception of deduction of MFP's advisory fees from wrap fee accounts, MFP does not take custody of funds or securities.

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct your account custodian to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person's account. Your account custodian maintains actual custody of your assets. You will receive account statements directly from your account custodian at least quarterly. They will be sent to the email or postal mailing address you provided. You should carefully review those statements promptly when you receive them.

Item 16 Investment Discretion

You may grant MFP authorization to manage your account on a discretionary basis. Discretionary authority will give MFP the authority to buy, sell, exchange and convert securities in your managed accounts. You will grant such authority to MFP by execution of the advisory agreement. You may terminate discretionary authorization at any time upon receipt of written notice by MFP.

Additionally, you are advised that:

1. You may set parameters with respect to when account should be rebalanced and set trading restrictions or limitations;
2. Your written consent is required to establish any mutual fund, variable annuity, or brokerage

- account;
3. MFP requires the use of the broker/dealer with which your Advisory Representative is registered for sales in commissionable mutual funds or variable annuities, if you elect to implement recommendations through your Advisory Representative;
 4. With the exception of deduction of MFP's advisory fees from the account, if you have authorized automatic deductions, MFP will not have the ability to withdraw your funds or securities from the account.

Item 17 Voting Client Securities

MFP does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact MFP about questions you may have an opinions on how to vote the proxies. However, the voting and how you vote the proxies is solely your decision.

Item 18 Financial Information

A. MFP will not require you to prepay more than \$500 and six or more months in advance of receiving the advisory service.

B. As stated above, MFP has discretionary authority over client accounts; however that authority does not extend to the withdrawal of any client assets, with the exception of deduction of MFP's advisory fees from your accounts. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.

C. Neither MFP nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.

Item 19 Requirements for State-Registered Advisers

Refer to the Part(s) 2B for background information about management personnel and those giving advice on behalf of our firm.

Neither our firm, nor any persons associated with our firm are compensated for advisory services with performance-based fees. Please refer to the "Performance-Based Fees and Side-By-Side Management" section above for additional information on this topic.

Neither our firm, nor any of our management persons have any reportable arbitration claims, civil, self-regulatory organization proceedings or administrative proceedings.

Neither our firm, nor any of our management persons have a material relationship or arrangement with any issuer of securities.

Our firm is not actively engaged in any business other than giving investment advice.