

Disclosure Brochure

March 18, 2014

Financial1One

This brochure provides information about the qualifications and business practices of Financial One, Inc. (hereinafter "Financial One" or the "Firm"). If you have any questions about the contents of this brochure, please contact the Firm at (561) 241-0000. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Financial One, Inc. is available on the SEC's website at www.adviserinfo.sec.gov.

Financial One, Inc. is an SEC registered investment adviser. Registration does not imply any level of skill or training.

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Item 2. Material Changes

This Item discusses only the material changes that have occurred since Financial One's last annual update. As this is the Firm's first annual update, there are no material changes to disclose in this item.

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Item 4. Advisory Business

Financial One offers a variety of advisory services, which include financial planning and wealth management services. The firm's core business objective is to assess clients' goals, risk tolerance and investment objectives, and to then propose and implement a mutually agreed upon, customized investment and wealth management strategy to address them. Prior to the rendering any of the foregoing advisory services, clients are required to enter into one or more written agreements with Financial One setting forth the relevant terms and conditions of the advisory relationship (the "*Agreement*").

Financial One has been conducting business as an investment adviser since September 2013, and is owned by its President, Howard L. Schwartz. As of December 31, 2013, the firm has \$20,000,000 in assets under management, all of which are managed on a discretionary basis.

While this brochure generally describes the business of Financial One, certain sections also discuss the activities of its *Supervised Persons*, which refer to the Firm's employees, officers, partners, directors (or other persons occupying a similar status or performing similar functions), or any other person who provides investment advice on Financial One's behalf and is subject to the Firm's supervision or control.

Financial Planning and Consulting Services

Financial One offers clients a broad range of financial planning and consulting services, which may include any or all of the following functions:

- Business Planning
- Cash Flow Analysis
- Asset Allocation
- Retirement Planning
- Tax Planning
- Insurance Planning
- Education Planning
- Estate Planning

The above services are generally offered in conjunction with discretionary investment portfolio management as part of a wealth management engagement (as described further below). In performing these services, Financial One is not required to verify any information received from the client or from the client's other professionals (e.g., attorneys, accountants, etc.) and is expressly authorized to rely on such information.

The Firm may recommend the services of itself and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if Financial One recommends its own services. The client is under no obligation to act upon any of the recommendations made by the Firm under a financial planning or consulting engagement or to engage the services of any such recommended professional, including Financial One itself. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any of Financial One's recommendations.

Clients are advised that it remains their responsibility to promptly notify Financial One if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising the Firm's previous recommendations and/or services.

Wealth Management Services

Financial One provides clients with wealth management services which generally include financial planning services as well as the discretionary management of investment portfolios.

The Firm primarily allocates clients' investment management assets among mutual funds, exchange-traded funds ("ETFs"), and individual debt and equity securities. The Firm may also allocate assets among *Independent Managers* (as defined below), master limited partnerships ("MLPs") and any other type of investment or legacy position held in client portfolios in order to achieve the desired investment objectives. In addition, in limited circumstances, Financial One may recommend that clients who qualify as accredited investors, as defined by Rule 501 of the Securities Act of 1933, invest in privately placed securities, which may include debt, equity and/or interests in pooled investment vehicles (e.g., hedge funds, private equity funds, etc.).

Clients may also engage Financial One to advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, the Firm directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company or the custodian designated by the product's provider.

Financial One tailors its advisory services to meet the needs of its individual clients and continuously seeks to ensure that client portfolios are managed in a manner consistent with their specific investment profiles. The Firm consults with clients on an initial and ongoing basis to determine their specific risk tolerance, time horizon, liquidity constraints and other qualitative factors relevant to the management of their portfolios. Clients are advised to promptly notify Financial One if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients may impose reasonable restrictions or mandates on the management of their accounts if Financial One determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

Use of Independent Managers

As mentioned above, Financial One may select certain *Independent Managers* to actively manage a portion of its clients' assets. The specific terms and conditions under which a client engages an *Independent Manager* are set forth in a separate written agreement between the designated *Independent Manager* and either Financial One or the client.

Financial One evaluates various information about each *Independent Manager* it chooses, which may include public disclosure documents, materials supplied by the *Independent Managers* themselves and/or other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the *Independent Managers'* investment strategies, past performance and risk results in relation to its clients' individual portfolio allocations and risk exposure. Financial One also takes into consideration each *Independent Manager's* management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other factors.

When working with *Independent Managers*, Financial One generally provides services relative to the discretionary selection of these managers. The Firm monitors the performance of those accounts being managed by *Independent Managers* on an ongoing basis, and seeks to ensure the strategies and target allocations utilized remain aligned with its clients' investment objectives and overall best interests.

If Financial One refers a client to an *Independent Manager* where Financial One's compensation is included in the advisory fee charged by such *Independent Manager* and the client engages the *Independent Manager*, Financial One is compensated for its services by receipt of a fee to be paid directly by the *Independent Manager* to Financial One in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended, and any corresponding state securities laws, rules, regulations, or requirements. Any such fee is paid solely from the *Independent Manager's* investment management fee, and does not result in any additional charge to the client.

Sponsor and Manager of the Financial One, Inc. Wrap Fee Program

Financial One is the sponsor and manager of the Financial One Wrap Fee Program (the "*Program*"), a wrap fee program. In the event certain clients participate in the *Program*, Financial One provides its investment management services and arranges for brokerage transactions under a single annualized fee. Participants in the *Program* may pay a higher aggregate fee than if investment management and brokerage services are purchased separately. A complete description of the *Program's* terms and conditions (including fees) are contained in the *Program's* wrap fee brochure.

Item 5. Fees and Compensation

Wealth Management Fees

Financial One provides wealth management services for an annual fee based upon the amount of assets under the Firm's management. The fee varies between 60 and 175 basis points (0.60% – 1.75%), depending upon the size of a client's portfolio, the type of services rendered and whether the Firm allocates assets to *Independent Managers*. Certain legacy clients may be subject to a different fee schedule. The annual fee is prorated and charged quarterly, in advance, based upon the market value of the assets being managed by Financial One on the last day of the previous billing period.

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For the initial term of an engagement, the fee is calculated on a *pro rata* basis. In the event the *Agreement* is terminated, the fee for the final billing period is prorated through the effective date of the termination and the unearned portion is refunded to the client, as appropriate.

Fee Discretion

Financial One, in its sole discretion, may negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention and *pro bono* activities.

Additional Fees and Expenses

In addition to the advisory fees paid to Financial One, clients may also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively "*Financial Institutions*"). These additional charges may include securities brokerage commissions, transaction fees, custodial fees, fees charged by the *Independent Managers*, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees and other fees and taxes on brokerage accounts and securities transactions. The Firm's brokerage practices are described at length in Item 12, below.

Fee Debit

Clients generally provide Financial One and *Independent Managers* with the authority to directly debit their accounts for payment of the investment advisory fees. The *Financial Institutions* that act as qualified custodian for client accounts have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to Financial One.

Account Additions and Withdrawals

Clients may make additions to and withdrawals from their account at any time, subject to Financial One's right to terminate an account and subject to the usual and customary securities settlement procedures. Additions may be in cash or securities provided that the Firm reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. If assets are deposited into or withdrawn from an account after the inception of a quarter, the fee payable with respect to such assets will not be adjusted or prorated based on the number of days remaining in the quarter.

The Firm designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. Financial One may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities

are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

Item 6. Performance-Based Fees and Side-by-Side Management

Financial One does not provide any services for performance-based fees. Performance-based fees are those based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7. Types of Clients

Financial One generally provides its services to individuals and families, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities.

Minimums Imposed By Independent Managers

Financial One does not impose a minimum portfolio size or minimum annual fee. Certain *Independent Managers* may, however, impose more restrictive account requirements and varying billing practices than Financial One. In such instances, Financial One may alter its corresponding account requirements and/or billing practices to accommodate those of the *Independent Managers*.

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

Investment Strategies and Methods of Analysis

The Firm utilizes various methods of analysis to analyze investments for clients including, but not limited to, fundamental analysis. Fundamental analysis involves the fundamental financial condition and competitive position of a company. Financial One will analyze the financial condition, capabilities of management, earnings, new products and services, as well as the company's markets and position amongst its competitors in order to determine the recommendations made to clients. The primary risk in using fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.

As stated above, the Firm primarily allocates clients' investment management assets among mutual funds, ETFs and individual debt and equity securities. The Firm may also allocate assets among *Independent Managers*, MLPs and any other type of investment or legacy position held in client portfolios in order to achieve the desired investment objectives.

Risks of Loss

General Risk of Loss

Investing in securities involves the risk of loss. Clients should be prepared to bear potential losses.

Market Risks

The profitability of a portion of Financial One's recommendations may depend to a great extent upon correctly assessing the future course of price movements of stocks, bonds and other securities. There can be no assurance that the Firm will be able to predict those price movements accurately.

Use of Independent Managers

As stated above, Financial One may recommend the use of *Independent Managers*. In these situations, the Firm continues to conduct ongoing due diligence of such managers, but such recommendations rely to a great extent on the *Independent Managers'* ability to successfully implement their own investment strategies. In addition, Financial One generally may not have the ability to supervise the *Independent Managers* on a day-to-day basis.

Mutual Funds and ETFs

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their *pro rata* NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 20,000 shares

or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Use of Private Collective Investment Vehicles

Clients may come to the Firm with legacy positions in privately placed collective investment vehicles. The managers of these vehicles will have broad discretion in selecting the investments. There are few limitations on the types of securities or other financial instruments which may be traded and no requirement to diversify. The private funds may trade on margin or otherwise leverage positions, thereby potentially increasing the risk to the vehicle. The client should have received a private placement memorandum and/or other documents explaining such risks.

Use of Margin

To the extent that a client authorizes the use of margin, and margin is thereafter employed by Financial One in the management of the client's investment portfolio, the market value of the client's account and corresponding fee payable by the client to the Firm will be increased. As a result, in addition to understanding and assuming the additional principal risks associated with the use of margin, clients authorizing margin are advised of the potential conflict of interest whereby the client's decision to employ margin shall correspondingly increase the management fee payable to Financial One. Accordingly, the decision as to whether to employ margin is left totally to the discretion of client.

Item 9. Disciplinary Information

Financial One has not been involved in any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of its management.

Item 10. Other Financial Industry Activities and Affiliations

Receipt of Insurance Commission

Certain of Financial One's *Supervised Persons*, in their individual capacities, are also licensed insurance agents with various insurance companies, and in such capacity, may recommend, on a fully-disclosed commission basis, the purchase of certain insurance products. A conflict of interest exists to the extent that Financial One recommends the purchase of insurance products where the Firm's *Supervised Persons* receive insurance commissions or other additional compensation.

Related Certified Public Accountants and Law Firm

Financial One does not render accounting advice, legal advice or tax preparation services to its clients. Rather, to the extent that a client requires these services, Financial One, if requested, will recommend the

services of a Certified Public Accountant or attorney that will perform these services independently and pursuant to a separate agreement.

Financial One shall not receive any of the fees charged by any recommended Certified Public Accountant or law firm, referral or otherwise. Specifically, the Firm's President, Howard Schwartz, is also an attorney and Certified Public Accountant and owner of a Certified Public Accounting and law firm, the Law Office of Howard L. Schwartz, P.A. Although Financial One shall not receive referral fees from these affiliated companies, Mr. Schwartz shall be entitled to receive distributions relative to his respective ownership interests. A conflict of interest exists to the extent Financial One recommends the services of these affiliated entities where Mr. Schwartz receives distributions in his capacity as an owner.

No portion of Financial One's financial planning or other advisory services should be interpreted as legal advice. Rather, clients should defer to the advice of their own attorney.

Item 11. Code of Ethics

Financial One has adopted a code of ethics in compliance with applicable securities laws ("*Code of Ethics*") that sets forth the standards of conduct expected of its *Supervised Persons*. Financial One's *Code of Ethics* contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its *Supervised Persons*, and the trading of securities ahead of clients in order to take advantage of pending orders.

The *Code of Ethics* also requires certain of Financial One's personnel (called "*Access Persons*") to report their personal securities holdings and transactions and obtain pre-approval of certain investments (e.g., initial public offerings, limited offerings). However, the Firm *Supervised Persons* are permitted to buy or sell securities that it also recommends to clients if done in a manner consistent with the Firm's policies and procedures. This *Code of Ethics* has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by *Access Persons* to be completed without any appreciable impact on the markets of such securities. Therefore, under certain limited circumstances, exceptions may be made to the policies stated below.

When the Firm is engaging in or considering a transaction in any security on behalf of a client where there may be a potential for conflict, no *Access Person* may knowingly effect for themselves or for their immediate family (i.e., spouse, minor children and adults living in the same household as the *Access Person*) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the *Access Person* is completed as part of a batch trade (as defined below in Item 12) with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Clients and prospective clients may contact Financial One to request a copy of its *Code of Ethics*.

Item 12. Brokerage Practices

Financial One generally recommends that clients utilize the brokerage and clearing services of TD AMERITRADE Institutional, a division of TD AMERITRADE, Inc. ("*TD Ameritrade*") for wealth management accounts. Financial One participates in the institutional customer program offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA ("*TD Ameritrade*"), an unaffiliated SEC-registered broker-dealer and FINRA member. *TD Ameritrade* offers to independent investment advisers services which include custody of securities, trade execution, clearance and settlement of transactions. Financial One receives some benefits from *TD Ameritrade* through its participation in the program.

Factors which Financial One considers in recommending *TD Ameritrade* or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. *TD Ameritrade* enables Financial One to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by *TD Ameritrade* may be higher or lower than those charged by other *Financial Institutions*.

The commissions paid by Financial One's clients comply with Financial One's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified *Financial Institution* might charge to effect the same transaction where the Firm determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a *Financial Institution's* services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Financial One seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

The Firm periodically and systematically reviews its policies and procedures regarding its recommendation of *Financial Institutions* in light of its duty to obtain best execution.

The client may direct Financial One in writing to use a particular *Financial Institution* to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that *Financial Institution*, and Financial One will not seek better execution services or prices

from other *Financial Institutions* or be able to “batch” client transactions for execution through other *Financial Institutions* with orders for other accounts managed by Financial One (as described below). As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, Financial One may decline a client’s request to direct brokerage if, in Financial One’s sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Transactions for each client generally will be effected independently, unless Financial One decides to purchase or sell the same securities for several clients at approximately the same time. Financial One may (but is not obligated to) combine or “batch” such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among Financial One’s clients differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among Financial One’s clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that Financial One determines to aggregate client orders for the purchase or sale of securities, including securities in which the Firm’s *Supervised Persons* may invest, Financial One generally does so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. Financial One does not receive any additional compensation or remuneration as a result of the aggregation. In the event that the Firm determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account’s assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a *de minimis* allocation in one or more accounts, Financial One may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker-dealers in return for investment research products and/or services which assist Financial One in its investment decision-making process. Such research generally will be used to service all of Financial One’s clients, but brokerage commissions paid by one client may be used to pay for research that is not

used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because the Firm does not have to produce or pay for the products or services.

Software and Support Provided by Financial Institutions

Financial One may receive from *TD Ameritrade*, without cost to the Firm, computer software and related systems support, which allow Financial One to better monitor client accounts maintained at *TD Ameritrade*. The Firm may receive the software and related support without cost because Financial One renders investment management services to clients that maintain assets at *TD Ameritrade*. The software and support is not provided in connection with securities transactions of clients (i.e., not "soft dollars"). The software and related systems support may benefit Financial One, but not its clients directly. In fulfilling its duties to its clients, Financial One endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the Firm's receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence Financial One's choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support or services.

There is no direct link between Financial One's participation in the program and the investment advice it gives to its clients, although Financial One receives economic benefits through its participation in the program that are typically not available to *TD Ameritrade* retail investors. Additionally, Financial One may receive the following benefits from *TD Ameritrade* through its registered investment adviser division: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its Registered Investment Adviser participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information.

These products or services may assist Financial One in managing and administering client accounts, including accounts not maintained at *TD Ameritrade*. Other services made available by *TD Ameritrade* are intended to help Financial One manage and further develop its business enterprise. The benefits received by Financial One's participation in the program do not depend on the amount of brokerage transactions directed to *TD Ameritrade*.

Item 13. Review of Accounts

Account Reviews

For those clients to whom Financial One provides wealth management services, the Firm monitors those portfolios as part of an ongoing and regular process to better position the client towards meeting their financial goals. It is part of the Firm's process to conduct quarterly account reviews to evaluate both

personal and market/economic developments that may impact the clients' long term goals and investment objectives. Such reviews are conducted by one of the Firm's investment adviser representatives.

All investment advisory clients are encouraged to discuss their needs, goals, and objectives with Financial One and to keep the Firm informed of any changes thereto. Financial One contacts ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Account Statements and Reports

Clients are provided with transaction confirmation notices and regular summary account statements directly from the *Financial Institutions* where their assets are custodied. From time-to-time or as otherwise requested, clients may also receive written or electronic reports from Financial One and/or an outside service provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should compare the account statements they receive from their custodian with those they receive from Financial One or an outside service provider

Item 14. Client Referrals and Other Compensation

Client Referrals

Financial One is required to disclose any direct or indirect compensation that it provides for client referrals. The Firm does not have any required disclosures to this Item.

Other Economic Benefits

In addition, Financial One is required to disclose any relationship or arrangement where it receives an economic benefit from a third party (non-client) for providing advisory services. This type of relationship poses a conflict of interest and any such relationship is disclosed in response to Item 12, above.

Item 15. Custody

Financial One's *Agreement* and/or the separate agreement with any *Financial Institution* may authorize the Firm through such *Financial Institution* to debit the client's account for the amount of Financial One's fee and to directly remit that management fee to Financial One in accordance with applicable custody rules.

The *Financial Institutions* recommended by the Firm have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management

fees paid directly to Financial One. In addition, as discussed in Item 13, Financial One may also send periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the *Financial Institutions* and compare them to those received from Financial One.

Item 16. Investment Discretion

Financial One may be given the authority to exercise discretion on behalf of clients. The Firm is considered to exercise investment discretion over a client's account if it can effect transactions for the client without first having to seek the client's consent. Financial One is given this authority through a power-of-attorney included in the agreement between Financial One and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). The Firm generally takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold;
- When transactions are made; and
- The *Independent Managers* to be hired or fired.

Item 17. Voting Client Securities

Financial One is required to disclose if it accepts authority to vote client securities. The Firm does not vote client securities on behalf of its clients. Clients receive proxies directly from the *Financial Institutions*.

Item 18. Financial Information

Financial One is not required to disclose any financial information pursuant to this Item due to the following:

- The Firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance;
- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.

Financial **1** *One*

Prepared by:



MARKETCOUNSEL®
The Adviser's Advisor®