



## SEC Registered Investment Adviser

21 Tamal Vista Boulevard #105  
Corte Madera, CA 94925  
415.924.1091

2608 Ninth Street #302  
Berkeley, CA 94710  
510.849.4667

[www.FinancialConnections.com](http://www.FinancialConnections.com)

## Form ADV Part 2A

February 1, 2015

This brochure provides clients and prospective clients with information about Financial Connections Group, Inc. and the qualifications, business practices, and nature of its services that should be carefully considered before becoming an advisory client. The contents of this brochure have not been approved or verified by the Securities and Exchange Commission, hereinafter the "SEC," or any other state or federal authority. While the firm is an investment adviser registered with the SEC, it does not imply a certain level of skill or training on the part of the firm or its associated personnel.

Questions relative to the firm, its services, or this ADV Part 2A may be made to the attention of Ms. Jill Hollander at (415) 924-1091. Additional information about the firm, other advisory firms, or associated investment adviser representatives is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Material Changes**

The following material changes have occurred since its last annual update to the brochure dated February 1, 2014:

Item 4: We have changed the Divorce Planning Services offered.

Item 4: We have changed the firm's assets under management as of December 31, 2014.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's Website: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or you may contact our firm at (415) 924-1091.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

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

Financial Connections Group, Inc. (the "firm") is an SEC registered investment adviser domiciled in the State of California. The firm is not a subsidiary of nor have control over another industry entity. In addition to the firm's notice filing with the State of California (original registration in 1994), Financial Connections Group, Inc. and its associated personnel may register or meet certain exemptions to registration in other states in which they conduct business. Ms. Jill Hollander is the firm's Managing Partner, Chief Compliance Officer, and majority shareholder.

The firm provides fee-only hourly financial planning and ongoing investment services that may be general in nature or focused on particular areas of interest or need. The firm holds itself to a *fiduciary standard*, which means Financial Connections Group, Inc. and its associates will act in the utmost good faith and performing in a manner believed to be in the best interest of its clients.

As of December 31, 2014, Financial Connections Group, Inc. provides investment management services under a discretionary account agreement involving approximately \$206.8 million<sup>1</sup> in client assets.

#### **Introductory Meeting**

A complimentary interview is conducted by a qualified representative of the firm to determine the scope of services to be provided. If a package is mailed via the postal service, the firm's ADV Part 2A and Privacy Policy are included. If the information is downloaded from the web site, the ADV Part 2A and Privacy Policy are also available.

Should the client wish to engage Financial Connections Group, Inc. for its services, parties must enter into a written agreement, with further discussion and analysis conducted thereafter to ascertain financial need, goals, holdings, etc. The ADV and Privacy Statement accompany an Agreement.

Advice is based upon the information disclosed by the client or their legal agent and incorporates the client's financial situation at the time the plan is presented. In performing its services the firm may, but is not required to, verify any information received from the client or from the client's agents.

The firm does not provide accounting or legal services. With the client's consent, the firm may work with the client's other advisers (accountants, attorneys, etc.) to assist with coordination and implementation of accepted strategies. The client should be aware that their other advisers may bill them separately for their services, and these fees will be in addition to those of the firm.

#### **Hourly Financial Planning**

Financial Connections Group, Inc. offers hourly financial planning services relating to the various components the client may desire, which may be either broad-based or more narrowly focused in design.

Financial Planning Services focus on advice that is long-term in nature and the advice is based upon information presented by the client. Advice may be provided on such subjects as savings for retirement,

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<sup>1</sup> The term "assets under management" and rounding to the nearest \$100,000 are as defined by the SEC's 2010 *General Instructions for Part 2 of Form ADV*.

planning for distributions in retirement, financial concerns of non-traditional couples, risk management, estate planning, asset allocation, long-term care, educational funding, goal setting, benefit considerations, financial concerns of professional women, or other needs as identified by the client. The firm will provide review and updates for a pre-existing plan or a second opinion for an investment portfolio if so engaged.

Financial Planning Services are not ongoing in nature unless provided for in the client agreement. If the firm is not engaged for ongoing services, Financial Planning Services terminate upon the project delivery.

The client retains absolute discretion over all implementation decisions and is free to accept or reject any recommendation made by the firm. Further, it remains each client's responsibility to promptly notify Financial Connections Group, Inc. if there is a material change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising the firm's recommendations or services.

When financial planning focuses only on certain areas of client interest or need, the client must understand that their overall situation or needs may not be fully addressed due to limitations they have established.

Unless the firm is engaged for long-term services, pursuant to a written agreement that includes review and updates, it would be the client's responsibility to engage additional services under a new engagement if desired.

#### Ongoing (Investment) Management

In the event the client desires Ongoing Management Services upon completion of the initial financial planning process, they may engage Financial Connections Group, Inc. Ongoing Management Services include:

- Investment Management Services which are ongoing in nature;
- Tracking of tax information for assets managed for the client's tax preparer;
- Financial planning; and
- Access to a long-term care consultant who may offer such services as the preparation of a long-term care plan, audit of long-term care policy, and assistance filing a claim. The consultant may also offer Medicare insurance advice.

An initial interview and data-gathering session is completed to determine the client's individual needs, goals, objectives, time horizons, risk tolerance and any other information the client may provide.

In the event that a client requests, the firm will manage all or a portion of a client's assets in accordance with the client's designated socially conscious ("SC") investment objective, in which the firm will allocate client assets among various mutual funds that have socially conscious investing as their primary investment objective.

The clients' active participation and involvement in the development of the portfolio as well its ongoing management is preferred. The firm encourages frequent client contact; however, it is up to the client to initiate the appointment at his/her convenience. Clients may call the office at any time during normal

business hours to discuss the client's account, financial situation or investment needs directly with an investment advisory representative of Financial Connections Group, Inc. *During the span of the advisory relationship, clients are obligated to promptly notify the firm of any changes in the client's financial status.* Prompt contact in this situation allows the client and firm to have the opportunity to review the current investment plan to help ensure the investment strategies continue to meet changing needs, or to determine if there needs to be a change in stated investment objectives or portfolio strategies.

#### Tax Preparation Services

Current ongoing Management Services clients may utilize tax preparation services. This service is no longer offered.

#### Divorce Planning Services

Financial Connections Group, Inc. reviews the financial impact of divorce on your future finances. As a Certified Financial Planner® Professionals with divorce training, we help develop a new spending plan for the next phase in your life. We offer advice on different strategies and help you to create a roadmap to financial success in our new life.

#### Speaking Engagements

Investment adviser representatives of the firm may provide speaking engagements or educational workshops on an “as announced” basis for groups desiring general advice on investments and personal finance. Topics may include issues related to asset/wealth management, financial planning, investment planning, retirement planning strategies, or various other economic topics. Such programs are purely educational in nature and do not involve the sale of any products.

#### General Information

The firm will use its best judgment and good faith effort in rendering its services to its clients. Financial Connections Group, Inc. cannot warrant or guarantee any particular level of account performance, or that an account will be profitable over time. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, the firm will not be liable to the client, heirs, or their assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by the firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from the firm's adherence to the client's or their legal agent's direction; or any act or failure to act by a service provider maintaining an account.

Notwithstanding the preceding, nothing within the client services agreement is intended to diminish in any way the firm's fiduciary obligation to act in the client's best interest or shall in any way limit or waive any rights clients may have under federal or state securities laws or the rules promulgated pursuant to those laws.

## **Item 5 - Fees and Compensation**

### **Hourly Financial Planning**

The firm provides financial planning on an hourly or fixed fee project basis. The current hourly rate is \$240; billed in 15-minute increments, and a partial increment will be treated as a whole. Engagements under a fixed fee agreement are generally based on the anticipated number of hours estimated to provide the requested services, multiplied by the current hourly rate.

The number of hours to complete the plan will be estimated and depend upon the level and scope of the planning services required as well as the nature and complexity. The firm may require an initial retainer up to one-half the project fee in order to schedule projects. Fees or project balances are due and payable upon delivery of the plan or advice.

If the client elects to engage the firm to provide ongoing management services (Investment Management, Ongoing Financial Planning Services), the fee for Hourly Financial Planning Services may be waived at the discretion of the firm during the initial engagement year.

### **Tax Preparation Services**

Previously, Ongoing Management Services clients may have been offered tax preparation services. Fees are charged at the hourly rate of \$240 and are negotiable at the discretion of a principal of the firm. However, this service is no longer offered to new clients.

### **Ongoing Management Services**

Financial Connections Group, Inc. charges an annualized asset-based fee for its ongoing management services as depicted in the following table.

<b>Assets Under Management</b>	<b>Annual Fee</b>
Up to \$1,000, 000	1.00%
\$1,000,001 to \$2,000,000	0.75%
\$2,000,001 to \$3,000,000	0.65%
\$3,000,001 and up	0.50% or Retainer

At the discretion of Financial Connections Group, Inc., an ongoing management client may be charged a Retainer or Flat-Fee. If engaged in this manner, the Retainer/Flat-Fee agreement may be reviewed and reassessed every two years.

The scope of the ongoing annual financial planning services to be rendered by Financial Connections Group, Inc. is intended to generally be limited to reviewing/evaluating/revising the firm's previous recommendations and/or services relative to a change in the client's financial situation and/or investment objectives.

In the unlikely event that a client requires extraordinary financial planning and/or consultation services, the firm may charge an additional fee for such extraordinary services at its current hourly rate. This additional fee may be subject to a separate *Financial Planning Agreement*.



In addition, in the event the client requires tax preparation services, such additional services shall be provided at an hourly rate of \$240. Existing clients may receive some tax preparation services under their original agreement and thus *grandfathered* for these services.

### **Endowments**

An investment policy statement is drafted with those responsible for the endowment. Items contributing to the policy are:

- Distribution amounts and frequency;
- Amount of money available for mid and long-term growth;
- Any bias of the endowment (i.e. socially responsible funds); and
- Any restrictions required by the endowment.

At minimum, an annual meeting is advised for review. Quarterly performance reports are sent to the designated representative. Fees are a percent of assets managed or a flat fee as noted in earlier sections that are reviewed every two years.

### **Independent Investment Managers**

For those clients that require an enhanced and/or specialized level of asset management services, Financial Connections Group, Inc. may recommend that certain clients authorize the active discretionary management of a portion of their assets by and/or among certain independent investment managers and/or investment programs (the "Independent Manager(s)"), based upon the stated investment objectives of the client.

Prior to recommending an Independent Manager, the firm will conduct in its belief to have been an appropriate level of due diligence on the recommended Independent Manager to include ensuring it is registered or notice-filed within client's jurisdiction. Factors which the firm will consider in recommending an Independent Manager include the client's stated investment objective, management style, performance, reputation, financial strength, reporting, pricing, and research.

The terms and conditions under which the client will engage the Independent Manager will be set forth in separate written agreements between the client and the firm, and the client and the designated Independent Manager. Financial Connections Group, Inc. will continue to render non-investment supervisory services to the client relative to the ongoing monitoring and review of account performance, asset allocation and client investment objectives, for which the firm will receive an annual advisory fee which is based upon a percentage of the market value of the assets being managed by the designated Independent Manager (between 0.20% and 1.00%). The investment management fees charged by the designated Independent Manager, together with the fees charged by the corresponding designated broker-dealer/custodian of the client's assets, are exclusive of, and in addition to, the firm's ongoing investment advisory fee.

### **"Householding" Accounts**

At its discretion, the firm may aggregate or "household" accounts (including multiple accounts) for the same individual or two or more accounts within the same family or related parties, or accounts where a family member/related party has power of attorney over another family member/related

party or incompetent person's account. Should, however, investment objectives be substantially different for any two or more household accounts requiring different investment approaches, the firm reserves the right to apply its fee schedule separately to each account.

### **Billing Cycle and Fee Assessments**

Asset-based fees for Ongoing Management services are billed quarterly in arrears based on the market value of the assets under management on the last business day of the previous quarter. Fees for ongoing management services are prorated based on deposits and withdrawals over \$100.

If the billing method is a flat fee/retainer, billing is also at the end of each quarter.

The account's first billing cycle will occur at the end of the current cycle once the account is funded. Irrespective of a partial period under the firm's management, however, it may be prorated.

Fee payments will generally be assessed within ten business days following each calendar billing period. For those accounts held by client's selected brokerage firm or custodian that the firm does not maintain an agreement, clients will be directly billed and fees will be due in full upon receipt of the firm's invoice.

For purposes of determining account asset value, securities and other instruments traded on a market for which actual transaction prices are publicly reported will be valued at the last reported sale price on the principal market in which they are traded. If there are no sales on such date, then they will be determined by the mean between the *closing bid* and *asked price* on such date. Other readily-marketable securities will be valued using a pricing service or through quotations from one or more dealers. In the absence of a market value, Financial Connections Group, Inc. may seek an independent third party opinion or through a good faith determination by a qualified firm associate.

The applicable ongoing management fees referenced include all fees and charges for the services of the firm and its investment adviser representatives. The client will be required to authorize in writing a selected broker/dealer or custodian ("service provider") to deduct advisory fees, applicable transaction charges, etc., from client accounts and all such fees will be clearly noted on client statements. Further information involving the firm's custodian relationship is described in Section 9 of this document.

*In all instances, the client shares the responsibility of verifying the accuracy of fee calculations in their invoice/statement.*

### **No Commission Mutual Funds**

Specific fund recommendations made by the firm will usually be for "no-load" (i.e., no commission) mutual funds. In some cases, as with certain mutual funds, there may not be a suitable selection available within the no-load category. However, there may be mutual funds shares that have a commission but can be purchased at NAV (without the commission) through the custodian's mutual fund marketplace.

Any transactional or custodial fees assessed by the selected service provider and/or individual retirement account or qualified retirement plan account termination fees are borne by the client and are as provided in the current, separate fee schedule of the selected service provider. Fees paid to the

firm for its services are separate from any charges the client may pay for mutual funds, exchange-traded funds (ETFs), exchange-traded notes (ETNs), or other investments of this type.

Fees charged by these issuers are detailed in prospectuses or product descriptions and clients are encouraged to read these documents before investing.

### **Termination of Services**

Either party may terminate the agreement at any time by written notice to the other. Should the client or their legal representative verbally notify Financial Connections Group, Inc. of the termination and, if in several business days following this notification the firm has not received notice in writing, the firm will make written notice of such termination in its records and will confirm our understanding to the former client.

Once either party terminates, no activities will be initiated by Financial Connections Group, Inc. (i.e., sale of mutual funds, etc.) unless requested by the terminated client.

A new client may terminate an agreement with the firm within five business days after the signing of the services agreement without penalty or charge. Thereafter, any prepaid, unearned fees will be promptly returned.

Following termination notice, it will remain the client or their legal representative's responsibility to ensure an immediate transfer is completed of any portfolio, account, or residual to the receiving service provider. The firm will not be responsible for future allocations, transactions, etc., upon receipt of a termination notice. If the client has not moved their account from under the Financial Connections Group, Inc. record of accounts within 60 days of termination notification, the firm may request the account(s) be moved from the institutional services division of the custodian to its retail services section.

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

The firm's investment management fees will not be based upon a share of capital gains or capital appreciation of the funds or any portion of funds of an advisory contract, also known as performance-based fees.

Financial Connections Group, Inc. prohibits any affiliated entity or employee to engage in or benefit from side-by-side investment management arrangements, often reflective of managing a hedge fund or other similarly pooled fund.

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

The firm offers its services to individual investors, couples, non-traditional couples, gay and lesbian couples, trusts, estates, endowments, profit sharing plans, and small businesses of various scales.

Clients or their legal representative (i.e., under a durable power of attorney) are expected to provide an adequate level of information and supporting documentation to the firm throughout the term of the engagement, including source of funds, income levels, client or legal agent's authority to act on behalf of the account, among others. This will allow the firm to determine the appropriateness of its investment strategy for the client or account.

The firm does not require minimum dollar value of assets or other conditions for any of its hourly financial planning. For Ongoing (Investment) Management clients, the firm generally requires an account minimum of \$750,000 or a minimum annual fee of \$7,500.<sup>2</sup>

Financial Connections Group, Inc. may charge a lesser asset-based fee determined by certain other criteria (i.e., existing financial planning client, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, existing client referral, etc.).

For those clients that have previously engaged the firm to perform financial planning services, the asset-based fee may be decreased (off-set) during the initial engagement year in an amount equal to the financial planning fee previously paid.

The firm reserves the right to decline services to any prospective client for any reason.

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

Financial Connections Group, Inc. attempts to measure an investor's goals, risk tolerance and time horizon through an interview process and information provided by the client in an effort to determine a plan/portfolio to best fit the investor's profile. Investment strategies may be based upon a number of concepts and determined by the type of investor. As the client's financial situation, goals, objectives, or needs change, the client must promptly notify the firm.

#### **Methods of Analysis**

The firm employs a fundamental analyses; using data to evaluate a security's intrinsic value. For example, fundamental analysis of a bond's value could involve evaluating economic factors including interest rates, the current state of the economy, and information about the bond issuer's credit ratings. Fundamental analysis of a stock takes into account revenues, earnings, future growth, return on equity, profit margins and other data to evaluate a company's value and its potential for future growth.

Information and research may be derived from commercially available software technology, securities rating services, general market and financial information, due diligence reviews and specific investment analysis requested by the clients from time-to-time.

#### **Investment Strategies**

Financial Connections Group, Inc. believes that asset allocation is a key component of investment portfolio design. The firm attempts to allocate assets across diverse investment categories (stock vs. bond, foreign vs. domestic, large cap vs. small cap, real assets, etc.) and believes it is a primary determinant of portfolio returns and long-term success of the client's financial objectives.

The firm generally employs development of a core portfolio with tactical overlays. Portfolios are designed with a long-term perspective. The firm will rebalance a portfolio while minimizing tax exposures, trading costs, etc. In limited circumstances, the firm may offer advice on shorter-term investment strategies when requested by the client.

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<sup>2</sup> We reserve the right, but are not obligated, to charge a lower fee and/or require a lower account minimum for those accounts opened prior to the date of this disclosure.

Recommended portfolios may include one or more investment vehicles, such as active or passive mutual funds, ETFs/ETNs, individual equity or debt securities, commercial paper, certificates of deposit, and municipal or government securities. Existing positions within a client account will also be evaluated and may be recommended to remain when deemed appropriate.

The firm does not manage but may offer assistance with partnership investments in an existing portfolio but limits its advice to reviews and consultation for the overall appropriateness of the investment. The nature of the advice will be based upon information provided by the client.

Financial Connections Group, Inc. may cause clients to purchase mutual fund shares for which the client pays a transaction charge. Although there may be similar mutual funds available with no transaction fees ("NTF funds"), the firm believes that the overall costs associated with NTF fund shares may be higher over the long term than the transaction charge paid initially by the client. Included in this philosophy is the firm's use of mutual funds within the Dimensional Funds group, which are not NTF funds.

### Risk of Loss

While Financial Connections Group, Inc. believes its strategies and investment selection is designed to potentially lose less than the markets when they decline and participate when they rise. It cannot warrant or guarantee that an investment objective or planning goal will be achieved. Some investment decisions made may result in loss, which may include the original principal invested. The client must be able to bear the various risks involved in the investment of account assets, which may include market, currency, interest rate, liquidity, operational or political risk, among others.

When the firm's research and analyses is based upon commercially available software, rating services, general market and financial information, or due diligence reviews, the firm is relying upon the accuracy and validity of the information or capabilities being provided by selected vendors, rating services, market data, and the issuers themselves. The firm makes every effort to determine the accuracy of the information received but it cannot foretell events or actions taken or not taken, or the validity of all information it has researched or provided which may or may not affect the advice to or investment management of a client account or financial plan.

The goal of the investment portfolio is not to beat an index but to generate a return consistent with the client's goals and objectives.

Financial Connections Group, Inc. looks for portfolio managers who have a significant investment in their own funds and, if they are small boutique companies, their employees also invest in the funds. The firm feels this enhances the possibility of a more tax efficient fund and puts the manager and employees on the same "side of the table" as its clients.

Those clients that direct the firm to allocate all or a portion of their investment assets among socially conscious ("SC") mutual funds should understand that the following limitations correspond to an SC objective:

- the current number of fixed income and equity SC mutual funds may be limited;
- because of this limitation, the ability of the firm to diversify client assets among different mutual funds is correspondingly limited;

- the number of publicly traded companies that meet the SC investment parameters are also limited;
- because of the current limitations of available SC funds and publicly traded companies that qualify for SC investing, there is a probability of similarity of holdings (fixed income and equity) amongst SC funds, which, depending upon the performance of the underlying securities, could have a more pronounced positive or negative impact on the SC portfolio; and
- as a result of earlier-stated limitations, an SC portfolio may be more volatile than a fully diversified portfolio, and is appropriate for SC investors with an investment time horizon in excess of five years.

Investment vehicles such as ETFs have the potential to be affected by “active risk” or “tracking error risk,” which might be defined as a deviation from their stated benchmark (index). Since certain ETFs attempt to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a “sample index” ETF that may not as closely align the stated benchmark. In these instances, the firm may choose to reduce the weighting of a holding or use a “replicate index” ETF as part of its core holdings to minimize the effects of the tracking error in relation to the overall portfolio.

Further, while many ETFs/ETNs are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are certain asset classes or holding periods within an ETF/ETN that may not benefit. Shorter holding periods as well as commodities and currencies may be considered “non-qualified” under certain tax code provisions, therefore, the holding’s QDI will be considered if tax-efficiency is an important aspect of the portfolio.

### **Item 9 - Disciplinary Information**

Neither Financial Connections Group, Inc. nor any of its associated personnel have been the subject of a reportable legal or disciplinary event pursuant the Investment Advisers Act of 1940 (as amended) or similar state statute.

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

Neither the firm nor its associated persons are affiliated with or maintain a material relationship or arrangement with another financial industry entity, such as a custodian or broker/dealer.

Financial Connections Group, Inc. is a member of the Garrett Planning Network (Garrett), an organization that assists financial planners in fee-only, financial planning practices. Garrett is not, nor believed required to be, a registered financial industry participant. The firm pays an annual membership fee to Garrett for extensive services that include a host of training, compliance and operational support to enhance its ability to provide quality service and advice to the investing public. Garrett members must also adhere to ethical guidelines, and meet experiential and education requirements.

Investment adviser representatives of the firm may hold individual membership or serve on boards or committees of professional industry associations such as the Financial Planning Association (FPA), National Association of Personal Financial Advisors (NAPFA), the Certified Financial Planner Board of Standards, Inc., among others.

Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and educational requirements.

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

The firm's policies require it and its personnel to conduct business activities in a manner that avoid actual or potential conflicts of interest between the firm, employees and clients, or that may otherwise be contrary to law.

The firm will provide disclosure to its client prior to and throughout the term of an engagement of any conflicts of interest which will or may reasonably compromise its impartiality or independence.

### **Code of Ethics**

The firm has adopted a Code of Ethics that sets forth the policies of ethical conduct for all personnel and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulation but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities. The firm's policies include the prohibition against insider trading, circulation of industry rumor, among others.

Firm personnel that are CFP® designees or FPA members also adhere to the Certified Financial Planner Board of Standards and Code of Ethics. These principles include:

#### ***Principle 1 – Integrity***

An adviser will provide professional services with integrity. Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Advisers are placed by clients in positions of trust, and the ultimate source of that trust is the adviser's personal integrity.

Allowance can be made for innocent error and legitimate differences of opinion; but integrity cannot co-exist with deceit or subordination of one's principles.

#### ***Principle 2 – Objectivity***

An adviser will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an adviser functions, an adviser should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

#### ***Principle 3 – Competence***

Advisers will maintain the necessary knowledge and skill to provide professional services competently.

Competence means attaining and maintaining an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Advisers make a continuing commitment to learning and professional improvement.

#### ***Principle 4 – Fairness***

Advisers will be fair and reasonable in all professional relationships. Fairness requires impartiality, intellectual honesty and disclosure of material conflict(s) of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests.

Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

#### ***Principle 5 – Confidentiality***

Advisers will protect the confidentiality of all client information. Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

#### ***Principle 6 – Professionalism***

Advisers will act in a manner that demonstrates exemplary professional conduct. Professionalism requires behaving with dignity and courtesy to all who use their services, fellow professionals, and those in related professions. Advisers cooperate with fellow advisers to enhance and maintain the profession's public image and improve the quality of services.

#### ***Principle 7 – Diligence***

Advisers will provide professional services diligently. Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

Additionally, associates of our firm that are NAPFA members adhere to its ***Fiduciary Oath*** that states that:

*"The advisor shall exercise his/her best efforts to act in good faith and in the best interests of the client*

*The advisor shall provide written disclosure to the client prior to the engagement of the advisor, and thereafter throughout the term of the engagement, of any conflicts of interest, which will or reasonably may compromise the impartiality or independence of the advisor.*

*The advisor, or any party in which the advisor has a financial interest, does not receive any compensation or other remuneration that is contingent on any client's purchase or sale of a financial product.*

*The advisor does not receive a fee or other compensation from another party based on the referral of a client or the client's business.*

#### ***Following the NAPFA Fiduciary Oath means I shall:***

- \* *Always act in good faith and with candor.*



- \* *Be proactive in disclosing any conflicts of interest that may impact a client.*
- \* *Not accept any referral fees or compensation contingent upon the purchase or sale of a financial product."*

Due to the nature and scale of the firm, not all organizational duties are segregated; however, the firm employs policies and procedures to ensure timely recordkeeping and supervision. Certain functions may be outsourced to assist in these efforts when deemed necessary.

Financial Connections Group, Inc. will provide of copy of its Code of Ethics to all clients and prospective clients upon request.

The firm periodically reviews and amends its Code of Ethics and written procedures to ensure currency, and all firm access persons are required no less than annually to attest to their understanding and adherence.

#### Privacy Statement

Financial Connections Group, Inc. is committed to maintaining the confidentiality, integrity and security of the personal information that it is entrusted.

The categories of nonpublic information that the firm may collect may include information about a client's personal finances needed for the financial planning process, investment management and/or tax preparation.

Upon the client's request, the firm will provide specific information to attorneys, accountants, and mortgage lenders with whom the client may have established a relationship. With the client's permission, the firm will share a limited amount of information with custodians in order to execute securities transactions on the client's behalf.

Financial Connections Group, Inc. maintains a secure office, including detection and alarm systems, to ensure that information is not placed at unreasonable risk. The firm employs a firewall barrier, data encryption techniques and authentication procedures within its computer environment.

The firm does not provide personal information to mailing list vendors or solicitors. Financial Connections Group, Inc. requires strict confidentiality in its agreements with unaffiliated third parties that require access to client information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review both firm and client records as permitted by law.

Personally identifiable information about a client will be maintained during the period of engagement, and for the period thereafter as required by federal and state securities and privacy laws. After that time, information may be destroyed.

The firm will notify its clients annually of its privacy policy and at any time, in advance, if its policy is expected to change.

#### Participation or Interest in Client Transactions

The firm has attempted to minimize conflicts by working on a fee-only basis, however, not all conflicts

can be eliminated. The professional services and their associated costs described in earlier sections of this brochure by their very nature present a potential conflict of interest if a client or prospective client is in need, for example, of paying off a home mortgage or funding their retirement.

The firm recommends a client pay off a mortgage or fully fund a retirement account, however, the prospective client must make the determination if they should forego a percentage of their resources to pay for the firm's advice, as they would for other professional services.

Since the firm offers its clients financial planning services, in addition to investment management services, a potential conflict of interest may exist. Therefore, the client is under no obligation to act upon a firm recommendation. If the client elects to act on any of the firm's recommendations, they are under no obligation to execute them through Financial Connections Group, Inc. or its associates.

Neither the firm, employees nor any related person are authorized to recommend to a client, or effect a transaction for a client, involving any security in which the firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

Employees are prohibited from taking or providing a loan from a client unless it is an approved financial institution or, in the case of a natural person, it is an immediate family member.

The firm recognizes that should it act as the adviser to the sponsor of an ERISA-qualified retirement plan (i.e., 401(k)) and one of its investment adviser representatives serves in an advisory capacity to one or more of the plan's participants, a potential or implied conflict of interest may occur. The firm may require its employee to cease in this plan participant advisory capacity or, upon disclosure to and approval from the plan sponsor, allow the dual advisory role to continue and with consideration made to offset fees.

### Personal Trading

The firm, its associates, and any related persons may buy or sell securities similar to those recommended to clients for their accounts. The firm may also make recommendations or take action with respect to investments for its clients that may differ in nature or timing from recommendations made to or actions taken for other clients or its employees. However, at no time will Financial Connections Group, Inc. or any related party receive preferential treatment over its clients.

In an effort to reduce or eliminate certain conflicts of interest involving personal trading, firm policy may require the utilization of published lists that restrict or prohibit transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm's Chief Compliance Officer in advance of the transaction in any related person's account. The firm maintains the required personal securities transaction records per regulation.

### **Item 12 - Brokerage Practices**

Financial Connections Group, Inc. is not affiliated with any service provider. When engaged to provide investment management services, the firm may offer to use the service provider with whom the prospective client's assets are currently maintained.

If you have engaged our firm to provide investment management services, we will recommend the services of TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC/NFA.<sup>3</sup> As stated earlier, our firm is independently owned and operated and is not legally affiliated with TD Ameritrade Institutional or any other firm we may recommend.

TD Ameritrade Institutional will hold your assets in an account in your name and will buy and sell securities when we instruct them. While we recommend that you use TD Ameritrade Institutional as your service provider, you must decide whether to do so and your account with TD Ameritrade Institutional will be entered into via an account agreement directly with them. We technically do not open the account for you, although we will assist you in doing so.

TD Ameritrade Institutional offers independent investment advisers services which include custody of securities, trade execution, clearance and settlement of transactions. Our firm receives some benefits from TD Ameritrade Institutional through participation in their programs (please see Item 14).

We periodically conduct an assessment of any service provider we recommend, including TD Ameritrade Institutional, which generally includes a review of their range of services, reasonableness of fees, among other items, and in comparison to their industry peers.

#### Best Execution

Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed in the previous section. The firm recognizes its obligation in seeking "best execution" for our clients; however, it is our belief that the determinative factor is not always the lowest possible cost but whether the selected service provider's transactions represent the best "qualitative" execution while taking into consideration the full range of services provided. Therefore, the firm will seek services involving competitive rates but it may not necessarily result in the lowest possible rate for each transaction. The firm has determined that having TD Ameritrade Institutional execute its trades is consistent with its duty to seek "best execution."

The firm will periodically review policies regarding its recommending service providers to clients in light of its duty to seek "best execution."

#### Client Referrals

All compensation paid to the firm is paid directly by the client and, therefore, the firm does not receive any additional compensation when its clients engage a recommended custodian or any other service provider.

#### Directed Brokerage

Financial Connections Group, Inc. does not require or engage in directed brokerage involving its accounts.

The client may direct Financial Connections Group, Inc. (in writing) to use another particular broker-

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<sup>3</sup> Our firm is not, nor required to be, a Financial Industry Regulatory Authority (FINRA), Securities Investor Protection Corporation (SIPC), or National Futures Association (NFA) member. You may learn more about the SIPC and how it serves member firms and the investing public by going to their website at <http://www.sipc.org>.

dealer to execute some or all transactions for the client's account. In these circumstances, the client is responsible for negotiating *in advance of the transaction* the terms and/or arrangements for their account with their selected service provider. The firm will not be obligated to seek better execution services or prices from these other service providers, nor be able to aggregate client transactions for execution through other custodians with orders for other accounts managed by the firm. As a result, the client may pay higher commissions or other transaction costs, experience greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Further, pursuant to the firm's obligation of best execution, it may decline a client's request to direct brokerage if the firm believes any directed arrangement would result in additional operational difficulties, expense, or risk to the firm.

### Trade Aggregation

Transactions for each client will generally be effected independently unless the firm decides to purchase or sell the same securities for several clients at approximately the same time often termed "aggregated" or "batched" orders. The firm does not receive any additional compensation or remuneration as a result of aggregated transactions.

Financial Connections Group, Inc. may (but is not obligated to) aggregate orders in an attempt to obtain better execution, negotiate favorable transaction rates, or to allocate equitably among client accounts should there be differences in prices and commissions or other transaction costs that might have been obtained had such orders been separately placed.

Within aggregated orders, transactions will generally be averaged as to price and allocated among the clients on a *pro rata* basis on any given day and the firm will attempt to do so in accordance with applicable industry rules. Client accounts where trade aggregation is disallowed or infeasible may be assessed higher transaction costs than those that are batched.

The firm reviews both its trade aggregation procedures and allocation processes on a periodic basis to ensure it remains within stated policies and/or regulation. Clients will be informed, in advance, should aggregation or allocation practices change.

It should be noted that, generally, the firm purchases shares of mutual funds which are priced at the end of the market day.

### Trade Errors

The firm corrects all trade errors through a Trade Error Account maintained by the firm's custodian, and the firm will be responsible for any losses in accounts. Likewise, any gains will be donated to a local charity.

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

Accounts are periodically reviewed throughout the year by firm principals.

Additional reviews may be triggered by news or research related to a specific holding, a change in the firm's view of the investment merits of a holding, or news related to the macroeconomic climate affecting a sector or holding within that sector.

Accounts may also be reviewed when being considered for an additional holding or an increase in a current position. Account cash levels above or below that deemed appropriate for the investment environment, given the client's stated tolerance for risk and investment objectives, or withdrawal requests may also trigger a review.

#### Content of Client Provided Reports and Frequency

Clients will receive account statements sent directly from mutual fund companies, transfer agents, custodians or brokerage companies where their investments are held. Our firm urges them to carefully review these statements for accuracy and clarity, and to ask questions when something is not clear.

Our firm may provide portfolio reports if it is engaged to provide periodic asset allocation or investment advice; however, our firm does not provide ongoing performance reporting under our financial planning and investment consultation services engagements.

For investment supervisory services accounts, the firm may provide quarterly reports or position performance summary reports, and annual realized gains/loss reports for taxable accounts. Certain clients may receive additional reports depending on their specific requirements.

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

#### Economic Benefit from External Sources and Potential Conflicts of Interest

Financial Connections Group, Inc. may receive an economic benefit from external sources in the form of the support products and services they make available to our firm and other independent investment advisers. As disclosed under Item 12, our firm participates in the TD Ameritrade Institutional customer program and the firm may recommend TD Ameritrade Institutional to its clients for custody and brokerage services.

There is no direct link between the firm's participation in the program and the investment advice given to clients, although the firm receives economic benefits through its participation in the program that are typically not available to "retail investors." These benefits include the following products and services (provided either without cost or at a discount):

- receipt of duplicate client statements and confirmations;
- research related products and tools;
- consulting services;
- access to a trading desk serving our clients;
- access to block trading (which provides the firm the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client's accounts);
- the ability to have advisory fees deducted directly from client's accounts per a written agreement;
- access to an electronic communications network for client order entry and account information;
- access to mutual funds with no transaction fees, and to certain institutional money managers; and
- discounts on compliance, marketing, research, technology, and practice management products or services provided to the firm by third party vendors.

TD Ameritrade Institutional may also pay for business consulting and professional services received by our firm. Some of the products and services made available by TD Ameritrade Institutional through a program may benefit the firm but may not benefit client accounts. These products or services may assist the firm in managing and administering client accounts, including accounts not maintained at either custodian. These other services made available by TD Ameritrade Institutional are intended to help our firm manage and further develop its business enterprise. The benefits received by our firm or its associates through participation in a program do not depend on the amount of brokerage transactions directed to TD Ameritrade Institutional.

As part of its fiduciary duty, Financial Connections Group, Inc. endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of any economic benefit by our firm or its associates in and of itself creates a potential conflict of interest and may influence the choice of TD Ameritrade Institutional for custody and brokerage services.

#### Advisory Firm Payments for Client Referrals

The firm does not currently engage in solicitation activities, as defined by Rule 206(4)-3 of the Investment Advisers Act of 1940 (as amended) or similar state regulation, nor does it pay a direct or indirect fee for referrals.

As earlier stated, Financial Connections Group, Inc. and associated personnel may be members of the Garrett Planning Network and other professional associations, such as NAPFA or the FPA. An added benefit some of these entities may provide to the investing public is the availability of an electronic map or listing on their website that allows interested parties (prospective clients) to search for participant firms (such as Financial Connections Group, Inc.) or individual financial planners within a selected state or region. The map or list may note advisory firm or individual financial planner contact information, and these passive websites may also provide means for interested persons to contact a firm or planner via electronic mail or telephone number so that the interested person may interview the participant firm or planner. Members of the public may also choose to telephone association staff to inquire about a firm or individual planner within their area, and would receive the same or similar information.

Prospective clients locating Financial Connections Group, Inc. or an individual associate via a noted venue are not actively marketed, nor do clients or prospective clients pay more for their services than another client who may be referred in another fashion, such as a personal referral. Further, the firm does not pay these entities for prospective client referrals nor is there a fee-sharing arrangement reflective of a solicitor engagement.<sup>4</sup>

#### **Item 15 - Custody**

Client funds and securities will be maintained by unaffiliated, qualified custodians (such as TD Ameritrade), banks, broker-dealers, mutual fund companies, or transfer agents; not with or by Financial Connections Group, Inc. nor any of its associates.

The client will be required to authorize in writing a selected service provider unaffiliated with Financial Connections Group, Inc. to deduct the firm's advisory fees from their account and all such fees will be clearly noted on client statements.

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<sup>4</sup> The firm believes this arrangement is in consonance with SEC No-Action Letter No. 1251421 in its response to the National Football League Players Association.

The firm will not accept or forward client securities (i.e., stock certificates) erroneously delivered to the firm.

At no time will a firm employee be authorized to have knowledge of a client's account access information (i.e., online 401(k), personal brokerage, or bank accounts), even for the "accommodation" of the client or their legal agent.

Firm policies restrict the firm and its associated persons from acting as trustee for or having full power of attorney over a client account unless it is an immediate family member.

At no time will the firm's fees for a client be collected for its services to be performed more than six months in advance *and* \$1,200 or more.

Clients will be provided transaction confirmations and summary account statements sent directly from their selected service provider; not through or by Financial Connections Group, Inc. Typically, these statements are provided on a monthly or quarterly basis, and as transactions occur. Clients are reminded to inform the firm if they do not receive these statements in a timely fashion. For those accounts that elect to receive electronic statements from the selected service provider, they must ensure they maintain a current electronic mail address with the service provider.

Clients may receive periodic reports from Financial Connections Group, Inc. that may summarize account performance. They are urged to compare their account statements received from the assigned service provider with those performance reports they receive from the firm for accuracy.

#### **Item 16 - Investment Discretion**

The firm generally provides investment management services to its ongoing clients via a discretionary account agreement. Similar to a limited power of attorney, this authority allows the firm to implement investment decisions, such as buys or sells of securities, on behalf of the account without prior client authorization in order to meet the account objectives.

Should the client desire an account to be managed in a non-discretionary manner, thereby restricting execution of any or all transactions to occur following client approval, the firm in its discretion has the authority to either terminate the account or continue to manage the account under a higher asset-based fee. Further, the client is hereby informed that before the firm is able to implement an investment decision on behalf of an account, such as a purchase or sale of a security, the client must grant the firm the authority to do so and the client must make themselves available and keep the firm apprised of their current contact information so that transaction instructions can be efficiently effected on their behalf.

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

##### **Proxy Voting**

The firm does not vote client proxies nor does it offer advice on how to vote proxies. Clients maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted as well as making all other elections relative to mergers, acquisitions, tender offers or other events pertaining to the client's investment assets. Should the client seek advice on how to vote the proxies they receive, they may contact the firm for a telephone or

personal consultation, for which the current hourly rate will apply.

#### Other Corporate Actions

The firm will have no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets.

#### Firm's Receipt of Materials

If the firm receives correspondence for a client relating to the voting of their securities, class action litigation, or other corporate actions, it will typically forward the correspondence to the client or another entity (i.e., client counsel, etc.) if so directed.

### **Item 18 - Financial Information**

#### Balance Sheet

With the exception of the firm having the ability to withdraw its advisory fees through the engagement of a qualified, unaffiliated custodian, the firm will not have custody of client assets (as described in Item 15). This includes its policy of not collecting fees from a client of \$1,200 or more for services to be performed six months or more in advance.

Due to the nature of the firm's services and operational practices, an audited balance sheet is not required nor included in this brochure.

#### Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

The firm and its management do not have a financial condition likely to impair their ability to meet commitments to clients.

#### Bankruptcy Petitions during the Past 10 Years

The firm and its management have not been the subject of a bankruptcy petition at any time during the past 10 years.