

Cover Page

Universal Financial Planning Consultants, Inc.

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March 27, 2015

This Brochure provides information about the qualifications and business practices of Universal Financial Planning Consultants, Inc. If you have any questions about the contents of this Brochure, please contact A. Larry Lock at (314) 721-5522 or via email at allock@ufgworld.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Universal Financial Planning Consultants, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Universal Financial Planning Consultants, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

Investment advisors must update the information in their firm brochure at least annually. In lieu of providing clients with an updated brochure each year, we will provide Universal Financial Planning Consultants, Inc.'s existing advisory clients with this summary page describing any material changes since the last annual update of the brochure. We will deliver a brochure or summary each year to existing clients within 120 days of the close of Universal Financial Planning Consultants, Inc.'s fiscal year. Clients wishing to receive a complete copy of the current brochure may request a brochure by contacting A. Larry Lock at (314) 721-5522 or via email at allok@ufgworld.com.

There are no material changes from the prior brochure dated March 25, 2014.

Universal Financial Planning Consultants, Inc. updated the brochure to reflect both discretionary and non-discretionary assets under management as of the previous year end, December 31, 2014. The new date of the brochure is now March 27, 2015.

Additional information about Universal Financial Planning Consultants, Inc. is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Universal Financial Planning Consultants, Inc. who are registered, or are required to be registered, as investment adviser representatives of Universal Financial Planning Consultants, Inc.

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Advisory Business

Universal Financial Planning Consultants, Inc. (hereinafter "UFPCI" or the "Firm"), offers personalized investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and other business entities. The Firm's services and fee arrangements are described in the following pages.

UFPCI is a corporation formed under the laws of the State of Missouri; and UFPCI is SEC registered and noticed filed in the States of Louisiana, Missouri and Texas. The firm has been conducting advisory services since 1986. This narrative provides Clients with information regarding UFPCI and the qualifications, business practices, and nature of advisory services that should be considered before becoming an advisory Client of UFPCI.

Individuals associated with UFPCI will provide its investment advisory services. These individuals are authorized to provide advisory services on behalf of UFPCI. Such individuals are known as Investment Adviser Representatives (IARs).

IARs with UFPCI are registered representatives of LPL Financial a licensed full service securities broker/dealer and investment adviser under federal and state securities laws, located in Boston, Massachusetts. LPL Financial is a member of the Financial Industry Regulatory Authority, Inc. ("FINRA") and the Securities Investors Protection Corporation ("SIPC"). Securities transactions for LPL's brokerage Clients are executed through LPL. UFPCI is not an affiliate of LPL Financial.

World Class Advisory

UFPCI provides investment advisory services to its clients on a discretionary basis. The advisory services include, among other things, providing advice regarding asset allocation and the selection of investments. Account management is guided by the stated objectives of the client. In addition, the Adviser considers the client's risk profile and financial status prior to making any recommendations.

Pension Consulting Services

UFPCI will provide pension-consulting services to employee benefit plans and their fiduciaries based upon an analysis of the needs of the plan. In general, these services may include an existing plan review, asset allocation advice, money management services, communication and

education services where UFPCI will assist the plan sponsor or trustee in providing meaningful information regarding the retirement plan to its participants, investment performance monitoring, and/or ongoing consulting.

All client accounts are regulated under the Employee Retirement Income Securities Act ("ERISA"). UFPCI will provide consulting services to the plan fiduciaries as described above. Typically, the named plan fiduciary must make the ultimate decision as to retaining the services of such investment advisers as UFPCI recommends. The plan fiduciary is free to seek independent advice about the appropriateness of any recommended services for the plan.

Selection of Other Advisers

UFPCI may refer its clients to various third-party advisers ("TPAs"), such as SEI Investments Management Corporation ("SIMC") or Neiman Capital Management, LLC ("NCM") for asset management services. All TPAs to whom UFPCI refers clients must be registered investment advisers with the Securities and Exchange Commission or with appropriate state authorities.

After gathering information about the client's financial situation and objectives, an IAR of UFPCI will make recommendations regarding the suitability of a TPA or investment style based on, but not limited to, the client's financial needs, investment goals, tolerance for risk, and investment objectives. Upon selection of a TPA(s), UFPCI will monitor the performance of the TPA(s) to ensure their performance and investment style remains aligned with the investment goals and objectives of the client.

Financial Planning and Consulting Services

Financial planning services will typically involve providing a variety of services, principally advisory in nature, to clients regarding the management of their financial resources based upon an analysis of their individual needs. An IAR of UFPCI will first conduct a complimentary initial consultation. After the initial consultation, if the client decides to engage the Firm for financial planning services, the IAR of UFPCI will conduct follow up meetings as necessary, during which pertinent information about the client's financial circumstances and objectives is collected. Once such information has been reviewed and analyzed, a written financial plan - designed to achieve the client's stated financial goals to the other party. In the event the agreement is terminated, the client will incur charges for and objectives - will be produced and presented to the client. The primary objective of this process is to allow the Firm to assist the client in

developing a strategy for the successful management of income, assets, and liabilities in meeting the client's financial goals and objectives.

Financial plans are based on the client's financial situation at the time the plan is presented and are based on financial information disclosed by the client to the Firm. Clients are advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. Past performance is in no way an indication of future performance. The Firm cannot offer any guarantees or promises that the client's financial goals and objectives will be met. As the client's financial situation, goals, objectives, or needs change, the client must notify the Firm promptly.

In limited circumstances, some clients may only require advice on a single aspect of the management of their financial resources. For these clients, the Firm offers financial plans in a modular format and/or general consulting services that address only those specific areas of interest or concern.

Clients may act on the Firm's recommendations by placing securities transactions with any brokerage firm the Client chooses. The Client is under no obligation to act on the Firm's financial planning recommendations. Moreover, if the Client elects to act on any of the recommendations, the Client is under no obligation to implement the financial plan through UFPCI.

LPL Financial Sponsored Advisory Programs

UFPCI may provide advisory services through certain programs sponsored by LPL Financial Corporation (LPL), a registered investment advisor and broker-dealer. Below is a brief description of each LPL advisory program available to UFPCI. For more information regarding the LPL programs, including more information on the advisory services and fees that apply, the types of investments available in the programs and the potential conflicts of interest presented by the programs please see the LPL Financial Form ADV Part 2A or the applicable program's Wrap Brochure and the applicable client agreement.

LPL Advisory Services

Optimum Market Portfolios Program (OMP)

OMP offers clients the ability to participate in a professionally managed asset allocation program using Optimum Funds Class I shares. Under OMP, client will authorize LPL on a

discretionary basis to purchase and sell Optimum Funds pursuant to investment objectives chosen by the client. UFPCI will assist the client in determining the suitability of OMP for the client and assist the client in setting an appropriate investment objective.

UFPCI will have discretion to select a mutual fund asset allocation portfolio designed by LPL consistent with the client's investment objective. LPL will have discretion to purchase and sell Optimum Funds pursuant to the portfolio selected for the client. LPL will also have authority to rebalance the account.

Personal Wealth Portfolios Program (PWP)

PWP offers clients an asset management account using asset allocation model portfolios designed by LPL. UFPCI will have discretion for selecting the asset allocation model portfolio based on client's investment objective. UFPCI will also have discretion for selecting third party money managers (PWP Advisors) or mutual funds within each asset class of the model portfolio. LPL will act as the overlay portfolio manager on all PWP accounts and will be authorized to purchase and sell on a discretionary basis mutual funds and equity and fixed income securities.

Model Wealth Portfolios Program (MWP)

MWP offers clients a professionally managed mutual fund asset allocation program. UFPCI will obtain the necessary financial data from the client, assist the client in determining the suitability of the MWP program and assist the client in setting an appropriate investment objective. UFPCI will initiate the steps necessary to open an MWP account and have discretion to select a model portfolio designed by LPL's Research Department consistent with the client's stated investment objective. LPL's Research Department is responsible for selecting the mutual funds within a model portfolio and for making changes to the mutual funds selected.

The client will authorize LPL to act on a discretionary basis to purchase and sell mutual funds (including in certain circumstances exchange traded funds) and to liquidate previously purchased securities. The client will also authorize LPL to effect rebalancing for MWP accounts.

In the future, the MWP program may make available model portfolios designed by strategists other than LPL's Research Department. If such models are made available, UFPCI will have discretion to choose among the available models designed by LPL and outside strategists.

Manager Access Select Program

Manager Access Select provides clients access to the investment advisory services of professional portfolio management firms for the individual management of client accounts. UFPCI will assist client in identifying a third party portfolio manager (Portfolio Manager) from a list of Portfolio Managers made available by LPL. The Portfolio Manager manages client's assets on a discretionary basis. UFPCI will provide initial and ongoing assistance regarding the Portfolio Manager selection process.

Fees and Compensation

World Class Advisory

Management fees are paid quarterly in advance and are negotiable. Fees are due on the first day of the calendar quarter, and will be deducted from the advisory account.

Fees are based on the account's asset value as of the last business day of the prior calendar quarter and are prorated for accounts opened during the quarter. Annualized fees are as follows:

Annualized Fees

Value of Assets Under Management	Maximum Fee Annually
\$15,000	3%

UFPCI's typical fees range from .5% to 1.5%.

An advisory client will have a period of five (5) business days from the date of signing the investment advisory agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, either party may terminate the agreement with 30 days written notice. Upon termination, fees will be prorated to the date of termination and any unearned portion of the fee will be refunded to the Client.

The account custodian may charge fees, which are in addition to and separate from the investment advisory service fee. Custodians may charge accounts for various transaction costs, retirement plan and administration fees. In addition, some mutual fund assets deposited in the account may have been subject to deferred sales charges and 12b(1) fees and other mutual fund annual expenses as described in each fund's prospectus. Advisory clients should also note

that fees for comparable services vary and lower fees for comparable services may be available from other sources.

UFPCI manages assets on a discretionary or non-discretionary basis. As of December 31, 2014, UFPCI managed \$10,851,269 on a non-discretionary basis and \$185,466,663 on a discretionary basis.

Pension Consulting Services Fees

The fees and fee-paying arrangements may vary depending on the services provided. The amount of the fee is negotiated on a case-by-case basis with the client, and is determined based upon a number of factors including, but not limited to, the amount of work involved and the complexity of the services requested. The final fee and fee paying arrangements will be clearly set forth in the advisory agreement signed by UFPCI and the client.

If the disclosure brochure - Part 2A of the Form ADV - is not delivered to the Client within 48 hours prior to the Client entering into the pension consulting agreement, the Client may terminate the agreement within five business days of the date of acceptance without penalty. If the Client received the disclosure documents 48 hours in advance or if the five-day grace period has expired, either party may terminate the agreement upon written notice to the other party. Bona fide pension consulting services provided prior to such cancellation and fees will be due and payable by the client. Fees paid in advance will be prorated to the date of termination, and any unearned fees will be returned to the client.

Selection of Other Advisers Fees

UFPCI will share in the fee paid by the client to the TPA. Clients who are referred to TPAs will receive full disclosure, including services rendered and fee schedules, at the time of the referral by delivery of a copy of the relevant TPA's Form ADV Part 2A or equivalent disclosure document. In addition, if the investment program recommended to a client is a wrap fee program, the client will also receive the wrap fee brochure provided by the sponsor of the program. The Firm or the TPA will provide to each client all appropriate disclosure statements, including disclosure of solicitation fees paid to UFPCI and its IARs.

Fees paid by the client to the TPA are established and payable in accordance with the Form ADV Part 2A or other equivalent disclosure document provided by each TPA to whom the client is referred and these fees may or may not be negotiable. Such compensation may differ depending upon the individual agreement UFPCI has with each TPA. As such, UFPCI or its IARs

may have an incentive to recommend one TPA over another TPA with whom it has less favorable compensation arrangements or other advisory programs offered by TPAs with which it has no compensation arrangements.

Clients may be required to sign an agreement directly with the TPA(s) selected. The client, the Firm or the TPA, in accordance with the provisions of those agreements, may terminate the advisory relationship. If the TPA is compensated in advance, the client will typically receive a pro rata refund of any prepaid advisory fees upon termination of an advisory agreement.

Financial Planning & Consulting Fees

These services are provided on either a fixed fee or hourly fee basis in accordance with the following fee schedule:

- Fixed Fees: Fixed fees range from \$250 to \$5,000, depending upon the scope and complexity of the financial planning services requested.
- Hourly Fees: Generally, the Firm charges an hourly rate ranging from \$75 to \$250 depending upon the scope and complexity of the contracted services.

When the scope of the financial planning services has been agreed upon, a determination will be made as to the applicable fee, and an estimate will be provided to the Client. The final fee, subject to negotiation, is directly dependent upon the facts and circumstances of the Client's financial situation and the complexity of the financial plan or services requested.

Generally, the Firm will require that the Client pay the financial planning fee in advance of any services rendered. Under no circumstance will the Firm require payment more than six months in advance in excess of \$500.

However, at the Firm's discretion, other fees and fee payment arrangements may be negotiated. The fees and terms of the financial planning services will be clearly set forth in the Client agreement executed between the Client and UFPCI. In limited circumstances, the cost/time could potentially exceed the initial estimate. In such cases, UFPCI will notify the Client and may request that the Client pay an additional fee.

Either party may terminate the financial planning agreement within five days of the date of acceptance without penalty to the Client. After the five-day period, either party may terminate the financial planning agreement by providing written notice to the other party. The Client will

incur a pro rata charge for advisory services rendered prior to such termination. In the event there are any prepaid unearned fees, the Firm will promptly refund a pro rata share to the Client.

Fees for LPL Advisory Programs

The account fee charged to the client for each LPL advisory program is negotiable, subject to the following maximum account fees:

Manager Access Select	3.0%
OMP	2.5%
PWP	2.5%
MWP	2.5%

Account fees are payable quarterly in advance.

LPL serves as program sponsor, investment advisor and broker-dealer for the LPL advisory programs. UFPCI and LPL may share in the account fee and other fees associated with program accounts. Associated persons of UFPCI may also be registered representatives of LPL.

Potential Conflicts of Interest

Transactions in LPL advisory program accounts are generally effected through LPL as the executing broker-dealer.

UFPCI receives compensation as a result of a client's participation in an LPL program. Depending on, among other things, the size of the account, changes in its value over time, the ability to negotiate fees or commissions, and the number of transactions, the amount of this compensation may be more or less than what UFPCI would receive if the client participated in other programs, whether through LPL or another sponsor, or paid separately for investment advice, brokerage and other services.

Advice offered by UFPCI may involve investment in mutual funds. Clients are hereby advised that all fees paid to UFPCI for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. Further, there may be transaction charges involved with purchasing or selling of securities.

UFPCI does not share in any portion of the brokerage fees/transaction charges imposed by the custodian holding the client funds or securities. The client should review all fees charged by mutual funds, UFPCI, and others to fully understand the total amount of fees to be paid by the client.

Performance-Based Fees and Side-By-Side Management

The fees charged are calculated in the previous Fee and Compensation section, and are not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory Client (15 U.S.C. §80b-5(a)(1)).

Types of Clients

UFPCI offers personalized investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and other business entities.

Investments in the World Class Advisory Account require a minimum account size of \$15,000.

LPL OMP: this program generally has a minimum account size of \$15,000.

LPL PWP: this program generally has a minimum account size of \$250,000.

LPL MWP: this program generally has a minimum account size of \$100,000.

LPL Manager Access Select: this program has a minimum account size of \$100,000, however, in certain instances; the minimum account size may be lower or higher.

Methods of Analysis, Investment Strategies and Risk of Loss

UFPCI will evaluate securities based on a fundamental analysis.

Fundamental analysis is a method of evaluating a security that entails attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors.

UFPCI does not represent, warrant, or imply that the services or methods of analysis employed by the Firm can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines.

UFPCI reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. UFPCI may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice.

Disciplinary Information

Investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of UFPCI or the integrity of UFPCI's management.

UFPCI has no information applicable to this Item.

Other Financial Industry Activities and Affiliations

IARs of UFPCI are separately licensed as registered representatives of LPL. In this capacity, associated persons are involved in the sale of securities of various types, including, but not limited to stocks, bonds, mutual funds, variable annuities, and limited partnerships. In addition, associated persons may also be involved in the sale of insurance products. As such, associated persons can effect transactions in insurance products for Clients and earn commissions for these activities.

All compensation received by IARs of UFPCI for securities transactions through LPL will be separate, yet customary for effecting securities transactions, including 12b-1 fees for the sale of investment company products. IARs may make differing recommendations with respect to the same securities or insurance products to different advisory clients. All recommendations made are specific to each client's individualized needs and current financial situation.

IARs of UFPCI, in their capacity as a registered representative and/or insurance agent, will effect securities transactions through LPL. If an advisory client implements recommendations made by the associated person by purchasing securities or other products through LPL, the associated

person will receive additional compensation in the form of commissions, including 12b-1 fees for the sale of investment company products.

UFPCI's clients are advised that they have total freedom to implement recommendations through any broker/dealer of their choosing.

In addition, from time to time, IARs of the Firm may receive 12b-1 distribution fees from investment companies (mutual funds) in connection with the placement of client funds into investment companies through their separate capacities as registered representatives of LPL. IARs will also sell insurance products and will receive income for the sale of such products.

As part of their fiduciary duty, the Firm, and its associated persons endeavor at all times to put the interest of the client first, clients should be aware that receipt of additional compensation itself creates a potential conflict of interest.

Code of Ethics

At times, UFPCI and/or its associated persons may take positions in the same securities as clients, and in all such cases will seek to avoid conflicts with clients. In accordance with its fiduciary responsibilities to its clients, UFPCI and/or its associated persons will generally be "last in" and "last out" for any trading that may occur in securities that are not exempt from federal reporting - e.g. mutual funds and direct obligations of the U.S. Government.

UFPCI or individuals associated with the Firm may buy or sell - for their personal account(s) - investment products identical to those recommended to Clients. It is the expressed policy of UFPCI that employees shall not have priority in any purchase or sale over clients' accounts.⁽¹⁾⁽²⁾

UFPCI has adopted a Code of Ethics, the full text of which is available to clients upon request. UFPC has several goals in adopting this Code. First, UFPC desires to comply with all applicable laws and regulations governing its practice, and the management of UFPCI has determined to set forth guidelines for professional standards, under which all associated persons of the Firm are to conduct themselves. UFPCI has set high standards, the intention of which is to protect client interests at all times and to demonstrate its commitment to its fiduciary duties of honesty, good faith and fair dealing with clients. All associated persons are expected to adhere strictly to these guidelines, as well as the procedures for approval and reporting established in the Code of Ethics primarily related to personal securities transactions, and violations of the Code. In addition, UFPCI maintains and enforces written policies reasonably designed to

prevent the misuse of material nonpublic information by the Firm or any person associated with the Firm.

Footnotes:

⁽¹⁾ This investment policy has been established recognizing that some securities being considered for purchase and/or sale on behalf of UFPCI's Clients trade in sufficiently broad markets to permit transactions by Clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions, will be maintained with UFPCI's records in the manner set forth above.

⁽²⁾ The foregoing does not apply to certain types of securities, such as obligations of the U.S. Government, and shares in open-end mutual funds. Open-end mutual funds are purchased or redeemed at a fixed net asset value price per share specific to the date of purchase or redemption. As such, transactions in mutual funds by Advisory Representatives are not likely to have an impact on the prices of the fund shares in which Clients invest.

Privacy Policies

Protecting client privacy is very important to UFPCI. The Firm views protecting its customers' private information as a top priority and, pursuant to the requirements of the federal Gramm-Leach-Bliley Act, the Firm has instituted policies and procedures to ensure that customer information is kept private and secure.

UFPCI does not disclose any nonpublic personal information about its customers or former customers to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client's account, UFPCI may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers.

UFPCI restricts internal access to nonpublic personal information about the client to those associated persons of the Firm who need access to that information in order to provide services to the client. As emphasized above, it has always been and will always be the Firm's policy never to sell information about current or former customers or their accounts to anyone. It is also the Firm's policy not to share information unless required to process a transaction, at the request of a customer, or as required by law.

IARs of UFPCI may purchase the same securities or other products recommended to clients for their own account. At no time will such a transaction be of such a size to influence the market for the security. Records of any such transactions are available for review.

UFPCI' clients or prospective clients may request a copy of the firm's Code of Ethics by contacting A. Larry Lock at (314) 721-5522 or via email at allok@ufgworld.com.

It is UFPCI' policy that the firm will not affect any principal or agency cross securities transactions for client accounts. UFPCI will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Brokerage Practices

UFPCI will recommend that a client in need of brokerage and custodial services utilize LPL. IARs of UFPCI are also registered as representatives of LPL, a broker/dealer and FINRA member firm. LPL is required to supervise the securities trading activities of its representatives.

Additionally, IARs who are registered representatives of LPL are subject to NASD Conduct Rule 3040, which may restrict such registered individuals from conducting securities transactions away from LPL, unless LPL provides the representative with written authorization. Therefore, clients are advised that IARs may be limited to conducting securities transactions through LPL and its clearing firm.

Review of Accounts

IARs of UFPC will monitor the respective client accounts managed by them on a regular basis to ensure the advisory services provided to the client are consistent with the client's investment needs and objectives. UFPCI will offer clients a formal account review on an annual basis or

more often upon request from the client. Triggering factors that may stimulate a review include, but are not limited to, significant market corrections, large deposits or withdrawals from an account and the client's request for an additional review.

For World Class Advisory accounts, clients will receive quarterly portfolio reports from the custodian, LPL.

LPL OMP Program: In addition to the quarterly portfolio reports described in the applicable program Wrap Brochure or the Form ADV Part 2A of LPL, LPL will transmit to clients: (1) trade confirmations unless the trade is the result of a systematic purchase, systematic redemption or systematic exchange; and (2) account statements, showing all transactions in cash and securities and all deposits and withdrawals of principal and income during the preceding calendar month.

LPL Manager Access Select, Model Wealth Portfolios and Personal Wealth Portfolios Programs: In addition to the quarterly portfolio reports described in the applicable program Wrap Brochure or the Form ADV Part 2A of LPL, LPL will transmit to clients account statements showing all transactions in cash and securities and all deposits and withdrawals of principal and income during the preceding calendar month.

Client Referrals and Other Compensation

Non-employee (outside) consultants, individuals and/or entities, who are directly responsible for bringing a Client to UFPCI, may receive compensation from UFPCI. Such arrangements will comply with the requirements set forth in Rule 206(4)-3 of the Investment Advisers Act of 1940, including the requirement that the relationship between the solicitor and the investment adviser be disclosed to the Client at the time of the solicitation or referral. Under these arrangements, the Client does not pay higher fees than UFPCI's normal/typical advisory fees.

Custody

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. UFPCI urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements

based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Investment Discretion

For World Class Advisory accounts, Clients may grant UFPCI authorization to manage client's account on a discretionary basis. Discretionary authorization provides UFPCI the ability to determine the securities to be purchased and sold and when such securities are purchased and sold. Client will grant such authority to UFPCI by execution of the client agreement. Where UFPCI enters into non-discretionary arrangements with clients, UFPCI will obtain client approval prior to the execution of any trade.

Voting Client Securities

The Firm will not vote proxies on behalf of advisory clients' accounts. Although, on rare occasions and only at the client's request, the Firm may offer clients advice regarding corporate actions and the exercise of proxy voting rights.

Class Action Lawsuits

From time to time, securities held in the accounts of clients will be the subject of class action lawsuits. The Firm has no obligation to determine if securities held by the client are subject to a pending or resolved class action lawsuit. It also has no duty to evaluate a client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore, the Firm has no obligation or responsibility to initiate litigation to recover damages on behalf of clients who may have been injured as a result of actions, misconduct or negligence by corporate management of issuers whose securities are held by clients.

Where the Firm receives written or electronic notice of a class action lawsuit, settlement or verdict affecting securities owned by a client, it will forward all notices, proof of claim forms and other materials, to the client. Electronic mail is acceptable where appropriate, and the client has authorized contact in this manner.

Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about UFPCI' financial condition. UFPCI has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.