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# FINLEY

## WEALTH ADVISORS

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A FEE-ONLY FIDUCIARY



**FINLEY WEALTH ADVISORS**

10600 CHEVROLET WAY, SUITE 101

ESTERO, FL 33928

239-267-7500

[WWW.MYWEALTHADVISOR.COM](http://WWW.MYWEALTHADVISOR.COM)

FORM ADV PART 2A&B

OCTOBER 29, 2024



## **Brochure Overview (ADV Part 2A)**

This Brochure provides information about the qualifications and business practices of Finley Wealth Management, LLC., DBA Finley Wealth Advisors (Advisor). If you have questions about the contents of this Brochure, please contact us at 239-267-7500 or by email at [doug@mywealthadvisor.com](mailto:doug@mywealthadvisor.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. While the firm is registered with the United States Securities and Exchange Commission, such registration does not imply a certain level of skill or training on the part of the firm or its personnel.

Additional information about Advisor is also available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov)

## **Material Changes**

This brochure has material changes since our last annual update of the brochure dated January 31, 2024. We suggest that you review the document in its entirety as there have been several changes since the previous update.

We will further provide you with a new Brochure as necessary based on changes or new information at any time, without charge. Currently, our Brochure may be requested by contacting us at 239-267-7500 or [doug@mywealthadvisor.com](mailto:doug@mywealthadvisor.com).

## **Advisory Business**

### **Firm Description**

In 2006, after serving a number of years working for major brokerage firms, Douglas Finley founded Finley Wealth Management, the parent company of Finley Wealth Advisors. The firm is strictly a fee-only, fiduciary, financial planning, and investment management firm. The firm DOES NOT sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm IS NOT affiliated with entities that sell financial products or securities. NO commissions in any form are accepted. NO finder's fees are accepted. The firm was designed with a keen focus on the client's best interests. Douglas Finley is 100% owner and sole principal of the firm.

Advisor provides personal financial planning and investment management to individuals, families and their related entities, trusts and estates, and family businesses. The firm works with clients to define financial objectives and to develop strategies for reaching those objectives, some of which may include: identification of financial problems, cash flow, and budget management, tax planning, risk exposure review, investment planning and management, education funding, retirement planning, estate planning, charitable goals, special needs planning, family business succession issues, and/or other issues specific to the client.

Assets under the direct management of the firm are held by independent custodians in the client's name. Advisor does not act as a custodian of client assets. The firm may recommend other professionals (e.g., lawyers, accountants, insurance agents, real estate agents, etc.) at the request of the client.

Other professionals are engaged directly by the client on an as-needed basis even when recommended by the Advisor. Conflicts of interest will be disclosed to the client and managed in the best interest of the client.

## **Types of Advisory Services**

### **Wealth Management Agreement**

Advisor's core offering is a Wealth Management Advisory Agreement which includes financial planning and investment management. It starts with a series of in-depth conversations and extensive data collection. With that information, we proceed to develop a financial plan for you and your family that identifies the specific investment criteria and strategies based on our careful review of the available investment options, taxation, transaction costs, risk, and of course, expected performance. This plan is prepared in conjunction with an Investment Policy Statement (IPS). These vital documents, are reviewed with you to ensure they reflect your needs and set the foundation for how we recommend the allocation of your investments between various asset classes. Upon completion of the initial planning, and the client's approval of the Investment Policy Statement, at the client's discretion, we provide ongoing Wealth Management services.

#### **Implementation and ongoing management of our clients' accounts include:**

- Design, execution, and maintenance of a customized Investment Policy Statement for those assets under the discretionary authority of Advisor.
- Active tax and cost-efficient investment portfolio management for assets under the discretionary authority of Advisor. This will include portfolio allocation and investment strategy.
- Maintain and update, as necessary, a "Needs Analysis", an analytical process that evaluates the likelihood of meeting stated goals, based on the client assets, liabilities, and relevant economic assumptions. This analysis is completed with financial planning software and is typically updated on an annual basis - more often if the client experiences a significant unanticipated life transition or there is a dramatic change in market conditions.

- Monitor investment portfolio and vehicles selected for implementation.
- As necessary, rebalancing, policy and/or strategy modification, and/or allocation changes.
- As requested, implementation of cash flow strategies for planned cash flow needs.
- As requested detailed written reports of the client investment portfolio(s) under our management.
- As requested, implementation of cost and tax-efficient liquidations for unanticipated cash flow needs.
- As requested, provision of preliminary tax information (realized and unrealized gains, delivery of information, and coordination with client's CPA) for client's tax planning, for assets under our management.
- Establishment and coordination of appropriate accounts along with related asset transfers to an independent custodian's platform.

**The annual Wealth Management Advisory fee is based on a percentage of investable assets according to the following schedule:**

- 0.80% on the first \$2,000,000
- 0.50% on the next \$3,000,000
- 0.25% on assets over \$5,000,000

The minimum household assets under the Wealth Management Agreement is \$2,000,000 negotiable under special circumstances, (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, related accounts, account composition, negotiations with clients, family members, etc.).

The advisory fee will be calculated quarterly in advance as a percentage of the market value of all assets in Investor's account on the last day of the month prior to the billing period. For new accounts, fees are prorated from inception through the end of the billing period. Additional contributions may be charged a prorated fee in the same manner. The advisor shall deduct all due and payable management fees automatically from Investor's account(s). Where applicable, Investor hereby expressly grants Advisor the authority to liquidate portions of Investor's account for the sole and express purpose of paying Investor's advisory fee unless Investor terminates Advisor's services pursuant to the Termination paragraph. The advisor may not be compensated on the basis of a percentage of capital gains or performance. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Wealth Management Agreement is an ongoing agreement the client or the wealth manager may at any time terminate an agreement by written notice to the other party. At termination, fees will be credited on a pro-rata basis for the portion of the quarter not completed. There is no additional termination fee charged by the Advisor.



## **Fees and Compensation**

The firm's compensation is solely from fees paid directly by clients. The firm does not receive a commission based on the client's purchase of any financial product, including insurance.

No commissions in any form are accepted. Advisor may receive soft dollar benefits in the form of technology or reimbursements for such from the custodians to whom we recommend clients.

The Firm does not sell any life insurance or annuities. The firm is compensated in the form of financial planning & advisory fees alone.

Advisor bases its fees on a percentage of assets under management. Under certain circumstances fees may be negotiable based on a variety of factors, including but not limited to the historical relationship, total assets, investable assets, types of assets, anticipated future additional assets, gross income, anticipated future earning capacity, the complexity of financial planning needs, relationships with other professionals, related accounts, or negotiations with clients.

## **Fee Billing**

The specific manner in which fees are determined by the Advisor is specified in each agreement. All clients are required to have a written agreement with the Advisor prior to the commencement of an engagement. Clients authorize Advisor to directly debit fees from client accounts. The fee is deducted by the custodian upon Advisor's instruction. Invoice are available in the custodian website.

Itemization includes the formula used to calculate the fee, the value of assets under management on which the fee is based, and the time period covered by the fee. It is important to note that custodial firms do not verify advisory fee calculations.

Advisory fees are calculated quarterly in advance as a percentage of the market value of all assets in the account on the last day of the month prior to the billing period. For new accounts, fees are prorated from inception through the end of the billing period.

Additional contributions made during the applicable calendar quarter may be charged a prorated fee in the same manner (with the exception of de minimis contributions). If a client has more than one account, the fee may be prorated between the accounts or deducted from individual accounts as determined by the Advisor to be in the client's best interest.

Where applicable, Investor(s) hereby expressly grant Advisor the authority to liquidate portions of Investor's account for the sole and express purpose of paying Investor's management fees.

Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. Advisor's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to the Advisor's fee, and Advisor shall not receive any portion of these commissions, fees, or costs.

## **Performance-Based Fees**

Advisor does not charge any performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a client). Performance-based compensation may create an incentive for the advisor to recommend an investment that may carry a higher degree of risk to the client.

## **Types of Clients**

The advisor may provide services to individuals, high net worth individuals, corporate pension and profit-sharing plans, charitable institutions, foundations, and endowments. Client relationships vary in scope and length of service.

## **Methods of Analysis**

The firm may use fundamental analysis to develop long-term strategies. Recommendations provided are based on publicly available reports, analysis, and research materials, computerized asset allocation modeling programs, and various subscription services. Employees of Advisor may also attend on and off-site visits with fund and portfolio managers, conference calls, and industry conferences.

## **Investment Strategies**

Advisor typically utilizes a risk-appropriate and tax-efficient globally diversified portfolio primarily consisting of mutual funds and exchange-traded funds.

The firm avoids the speculative and unnecessary activities of stock-picking, manager-picking, and market timing. A disciplined approach is employed, emphasizing broad diversification and consistent exposure to the publicly traded markets around the world, with a slight overweighting of small and value-priced companies. Portfolios are globally diversified to control the risks associated with traditional markets.

The investment strategy for a specific client is based upon the objectives, income needs, and tax situation stated by the client during consultations. The client may change these objectives at any time.

## **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach keeps the risk of loss in mind. However, as with all investments, clients face investment risks including the following: Loss of Principal Risk, Interest-rate Risk, Market Risk, Inflation Risk, Currency Risk, Reinvestment Risk, Business Risk, Liquidity Risk, and Financial Risk.

## **Legal and Disciplinary**

The firm and its employees have not been involved in any legal or disciplinary events related to past or present activities.

## **Affiliations**

Advisor does not have arrangements that are material to its advisory business or its clients with any related person.

## **Code of Ethics**

Advisor has adopted the CFP Board Code of Ethics to establish the highest principles and standards.

These Principles are general statements expressing the ethical and professional ideals certificants and registrants are expected to display in their professional activities. As such, the Principles are aspirational in character and provide a source of guidance for certificants and registrants. The Principles form the basis of the CFP Board's Rules of Conduct, Practice Standards, and Disciplinary Rules, and these documents together reflect the CFP Board's recognition of certificants' and registrants' responsibilities to the public, clients, colleagues, and employers.



**Principle 1 – Integrity: Provide professional services with integrity.**

*Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Certificants are placed in positions of trust by clients, and the ultimate source of that trust is the certificant's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion, but integrity cannot co-exist with deceit or the subordination of one's principles.*

**Principle 2 – Objectivity: Provide professional services objectively.**

*Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which a certificant functions, certificants should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.*

**Principle 3 – Competence: Maintain the knowledge and skill necessary to provide professional services competently.**

*Competence means attaining and maintaining an adequate level of knowledge and skill, and application of that knowledge and skill 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. Certificants make a continuing commitment to learning and professional improvement.*

**Principle 4 – Fairness: Be fair and reasonable in all professional relationships. Disclose conflicts of interest.**

*Fairness requires impartiality, intellectual honesty, and disclosure of material conflicts 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.*

**Principle 5 – Confidentiality: 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: Act in a manner that demonstrates exemplary professional conduct.**

*Professionalism requires behaving with dignity and courtesy to clients, fellow professionals, and others in business-related activities. Certificants cooperate with fellow certificants to enhance and maintain the profession's public image and improve the quality of services.*

### **Principle 7 – Diligence: 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.*

The advisor will provide clients or prospective clients with a copy of the firm's Code of Ethics upon request.

## **Participation or Interest in Client Transactions**

Advisor and its employees may at times buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Personal trading of employees is never based on inside information and clients of the firm receive preferential treatment. The trades are not of a significant enough value to affect the securities markets. Employees comply with the provisions of the firm's "Policies & Procedures Manual". The Chief Compliance Officer of Finley Wealth Advisors is Janice Hirzel.

## **U.S. Department of Labor IRA Rollover Disclosures**

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interests ahead of yours.

## **Selecting Brokerage Firms**

Advisor does not have any affiliation with product sales firms. The firm may recommend custodians based on the proven integrity and financial responsibility of the firm, best execution of orders at reasonable rates, and the quality of client service, such as Altruist Financial and Charles Schwab Institutional.

Advisor does not receive fees or commissions from any of these arrangements, although Advisor may benefit from electronic delivery of client information, electronic trading platforms, and other services provided by custodians for the benefit of clients. Advisors may also benefit from other services provided by custodians, such as research, continuing education, and practice management advice. These benefits are standard in a relationship with these custodians and are not in return for client recommendations or transactions.

The advisor reviews the execution of trades at each custodian annually. Trading fees charged by the custodians are also reviewed on an annual basis. Advisor does not receive any portion of the trading fees.

## **Soft Dollars**

Advisor may receive soft dollar benefits in the form of technology or reimbursements for such from the custodians to whom we recommend clients.

## **Periodic Reviews**

Periodic reviews are recommended for financial planning clients. It is the client's sole responsibility to initiate those reviews. Investment accounts are periodically reviewed throughout the year by the firm principal. The client's current asset allocations are considered, along with the likelihood that the allocation will meet the investment objectives of the client.

## **Review Triggers**

Account reviews are performed more frequently when market conditions dictate, or when a client's objectives change. A review may be triggered by client requests, changes in market conditions, new information about an investment, changes in tax laws, or other important changes.

## **Incoming Client Referrals**

Our firms' referrals have come from current clients, estate planning attorneys, accountants, employees, and other sources. Advisor does not pay for referrals.

## **Referrals to Other Professionals**

Advisor does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## **Account Statements**

Clients receive at least quarterly statements from the custodian that holds and maintains the client's investment assets. Advisor urges clients to carefully review such statements and compare such official custodial records to any 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.

## **Discretionary Authority for Trading**

Advisor receives discretionary authority from the client at the start of an advisory relationship. We have the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. Advisor currently has approximately \$115 million in assets under discretion.

## Limited Power of Attorney

Clients must sign a limited power of attorney before the Advisor is given discretionary authority. The limited power of attorney may be included in the qualified custodian's account application, or clients may sign a separate limited power of attorney document giving discretionary authority to the firm.

## Proxy Votes

As a matter of firm policy and practice, Advisor does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios.

## Financial Condition

Advisor does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. A balance sheet is not required to be provided because the Advisor does not serve as a custodian for client funds or securities, other than as described above, and does not require prepayment of fees of more than \$1,200 per client, six months or more in advance.

## Business Continuity Plan

Advisor has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss in the event of an unexpected and wide-spread disruption to the firm's normal operations.

The Business Continuity Plan covers natural disasters such as hurricanes, tornadoes, flooding, and man-made disasters such as loss of electrical power, communications line outage, and internet outage. Alternate offices are identified to support ongoing operations in the event the main office is unavailable. Electronic files are backed up and archived offsite. It is our intention to contact all clients as soon as possible after a disaster to notify them of any change in office location and the expected duration.

## Information Security Program

Advisor maintains an information security program to reduce the risk that personal and confidential information may be breached. Advisor uses multiple safeguards offered by third-party vendors to ensure records in electronic storage are reasonably safeguarded against loss, alteration, or destruction. The firm password protects unauthorized access to its records. Electronic files are backed up frequently throughout the day and are archived offsite.

## SEC Registered Advisor

Finley Wealth Management, LLC DBA Finley Wealth Advisors is an SEC-Registered Investment Advisor and is required to provide you with certain information or disclosures about its principals. This information can be found in ADV Part 2B.



## **Brochure Supplement (ADV Part 2B)**

### **Supervised Persons**

**Douglas Finley**

**Amber Braatz**

**Rosanne Rogé**

Finley Wealth Advisors  
10600 Chevrolet way, Suite 101  
(239) 267-7500

**As of January 31, 2024**

This brochure supplement provides information about Douglas Finley, Amber Braatz, and Rosanne Rogé that supplements the Advisor brochure.

You should have received a copy of that brochure. Please contact Advisor if you did not receive Advisor's brochure or if you have questions about the contents of this supplement. Additional information about Douglas Finley, Amber Braatz, and Rosanne Rogé is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Education and Business Standards Advisor requires that any employee whose function involves determining or giving investment advice to clients must be a graduate of a four-year college and must:

1. Have at least two years' experience in insurance, investments, accounting, financial planning or be supervised by a qualified advisor;
2. Be an attorney, or hold or be pursuing one of the following designations: Certified Financial Planner™ (CFP®), Certified Public Accountant (CPA), Certified Financial Analyst (CFA) or Chartered Financial Consultant (ChFC®);
3. Subscribe to the Code of Ethics of the CFP® Board of Standards;
4. Be properly authorized for all advisory activities in which they are engaged.

Professional Certifications Employees have earned certifications and credentials that are required to be explained in further detail.

CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education: Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include professional conduct and regulation, general principles of financial planning, risk management and insurance planning, investment planning, tax planning, retirement savings and income planning, estate planning, and psychology of financial planning;
- Examination: Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience: Complete at least two years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics: Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.



Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Ethics: Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

## **Douglas W. Finley, MS, CPWA®, CFP®, AEP®, CDFA®**

### **President**

Date of birth: 02/26/1966

### **Educational Background:**

Certified Private Wealth Advisor

Issuing Organization: Investments & Wealth Institute

Prerequisites/Experience Required Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and five years of financial services experience

Educational Requirements: Candidate must complete a rigorous 6 months curriculum.

Examination Type: CPWA® Examination

Continuing Education: 40 hours every two years

**CFP®, CERTIFIED FINANCIAL PLANNER™**

Issuing Organization: Certified Financial Planner Board of Standards, Inc.

Prerequisites/Experience Required Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and Three years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP Certification Examination

Continuing Education: 30 hours every two years

### **AEP® – Accredited Estate Planner®**

**Issuing Organization: National Association of Estate Planners & Councils**

Prerequisites/Experience Required: The candidate must meet all of the following requirements:

- Must be an attorney (JD), accountant (CPA), insurance professional, financial planner (CLU/ChFC, CFP) or trust officer (CTFA)
- Must be in good standing with their professional organization and not be subject to a disciplinary investigation
- Must have a minimum of 5 years' experience in estate planning in one or more of the prerequisite professions

Educational Requirements: 2 graduate-level courses administered by The American College or from another accredited graduate program as part of a master's or doctoral degree unless the applicant has 15 or more years' experience as an estate planner

Examination Type: Final exam for each course. If self-study through The American College must be taken at Pearson VUE testing centers, which are proctored.

Continuing Education/Experience Requirements:

- 30 hours every 24 months, including 15 hours in estate planning. Re-certification required annually.

### **CDFA™ - Certified Divorce Financial Analyst™**

**Issuing Organization: Institute for Divorce Financial Analysts**

Prerequisites/Experience Required: Candidates must meet all of the following requirements:

- The CDFA™ designation is available to individuals who have a minimum of two years' experience as a financial professional, accountant, or matrimonial lawyer.

- To earn the designation, the participant must complete a series of self-study course modules and pass an exam for each module.
- In the USA, this training qualifies for 32 hours of continuing education for the CFP® Board of Standards, 25 CPE credits for the CPA designation, and 32 PACE credits for ChFCs and CLUs.
- To retain the Certified Divorce Financial Analyst™ designation, a CDFA™ must obtain 20 hours of Continuing Education (CE) every two years (ten of which must be divorce-related), remain in good standing with the IDFA™, and keep his/her dues current.

**Arizona State University, Tempe, Arizona**

Bachelors of Science Degree, Finance

**The College for Financial Planning, Denver, CO**

Masters of Science Degree, Financial Planning

**CFP® Professional Education Program**

The College for Financial Planning, Denver, CO

**Business Experience:**

Prior to founding Finley Wealth Management, LLC in 2006, Mr. Finley was a Fee-Only Financial Planner and Investment Advisor at a Registered Investment Advisory firm in Fort Myers, FL with the title of Senior Wealth Manager 2003

2006. He is an active member of the National Association of Personal Financial Advisors (NAPFA), a member of the National Association of Estate Planners & Councils (NAEPC), a former board member (2006-2015) of the Lee County Estate Planning Council.

**Disciplinary Information:**

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

**Other Business Activities:**

There are no outside investment-related business activities to be disclosed.

Additional Compensation No one who is not a client provides an economic benefit to Mr. Finley for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes and any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts.

## **Amber Braatz, MBA, CFP®**

### **Wealth Advisor**

Date of birth: 01/14/1971

### **Educational Background:**

University of Florida

Bachelors of Science Degree (1992)

Florida Gulf Coast University

Masters of Business Administration (2005)

CFP® Professional Education Program

Northwestern University (2018)

### **Business Experience:**

Amber joined Finley Wealth Management in early 2018 and completed her certified financial planner education program through Northwestern University. Amber has a passion for helping people achieve financial and life goals. It was a natural transition from healthcare to a financial advisor with her career-long emphasis on serving others with goal-driven, individualized care. She is an active member of the National Association of Personal Financial Advisors (NAPFA).

### **Disciplinary Information:**

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

### **Other Business Activities:**

There are no outside investment-related business activities to be disclosed.

**Additional Compensation** No one who is not a client provides an economic benefit to Amber Braatz for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes and any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts.

**Rosanne Rogé, RFGsm, CSA™ CFP®**  
**Wealth Advisor**

Date of birth: 02/14/1956

**Educational Background:**

Pace University, NYC

Bachelor of Arts Degree and Associate in Applied Science (1982)

C.W. Post Long Island University

CFP Certificate Program in Financial Planning from C.W. (1996)

Financial Paraplanner College of Financial Planning

Para-Planner Program (1992)

**Business Experience:**

Rosanne in addition to being a Certified Financial planner, "Roe" is also a Certified Senior Advisor and Registered Financial Gerontologist and understands the needs of caregivers assisting their aging parents or other family members. This interest came about after caring for her mother in her own home, for over ten years while perusing a full-time career in financial services. Earning the CSATM designation gave her the unique insight into the needs of the aging, their caregivers and the financial impact on their family, friends and society. This experience motivated her to focus her on incorporating those issues into the plans prepared for clients and to promote those findings and issues to the financial services industry.

**Disciplinary Information:**

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

**Other Business Activities:**

There are no outside investment-related business activities to be disclosed.

**Additional Compensation** No one who is not a client provides an economic benefit to Rosanne Rogé for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes and any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts.