



Coordinated Financial Planning Corporation

Form ADV Part 2A - Brochure

March 13, 2024

This brochure provides information about the qualifications and business practices of Coordinated Financial Planning Corporation. If you have any questions about the contents of this brochure, please contact us at 513-769-3131 or SteveJr@cfplan.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.

Coordinated Financial Planning Corporation is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training.

Additional information about Coordinated Financial Planning Corporation is also available on the SEC's website at www.adviserinfo.sec.gov by searching by our name or CRD #105143.

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Item 2 Material Changes

Form ADV 2 is divided into two parts: Part 2A (the "Disclosure Brochure") and Part 2B (the "Brochure Supplement"). The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Coordinated Financial Planning Corporation.

Coordinated Financial Planning Corporation believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Coordinated Financial Planning Corporation encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

There have been no material changes to our Part 2A Brochure since our last annual update dated March 8, 2023.

Item 3	Table of Contents	
Item 1	Cover Page	
Item 2	Material Changes	2
Item 3	Table of Contents	3
Item 4	Advisory Business	4
	Investment Supervisory Services ("ISS") Model Portfolio Management	4
	Investment Supervisory Services ("ISS") Individual Portfolio Management	5
	Financial Planning	5
	Assets Under Management	6
Item 5	Fees and Compensation	6
	Investment Supervisory Services ("ISS") Portfolio Management Fees	6
	Financial Planning Fees	7
	General Information	7
Item 6	Performance-Based Fees and Side-By-Side Management	8
Item 7	Types of Clients	8
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss	9
	Methods of Analysis	9
	Investment Strategies	10
Item 9	Disciplinary Information	11
Item 10	Other Financial Industry Activities and Affiliations	11
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
Item 12	Brokerage Practices	12
Item 13	Review of Accounts	14
	Investment Supervisory Services ("ISS") Model Portfolio Management Services	14
	Financial Planning Services	14
Item 14	Client Referrals and Other Compensation	14
Item 15	Custody	15
Item 16	Investment Discretion	15
Item 17	Voting Client Securities	16
Item 18	Financial Information	16

Item 4 Advisory Business

Coordinated Financial Planning is a SEC-registered investment adviser with its principal place of business located in Ohio. Coordinated Financial Planning began conducting business in 1983. Coordinated Financial Planning Corporation is owned and operated by Stephen H. Perrin, Jr., President. Coordinated Financial Planning offers the following advisory services to our clients:

Investment Supervisory Services ("ISS") Model Portfolio Management

Our firm provides portfolio management services to clients using model asset allocation portfolios. Each model portfolio is designed to meet a particular investment goal.

- **Actively Managed:** This model uses our risk model techniques. We assess risk in the market by looking at market valuations, market psychology and monetary conditions. As we assess risk rising, we reduce equity exposure and increase exposure to fixed income. As we assess increasing equity exposure, we decrease fixed income exposure. In this model, we never decrease equity less than 10% of model.
- **Conservative:** This model is for conservative growth investors with a smaller element of equity exposure in assets with low correlations to equities.

We manage these advisory accounts on a discretionary basis. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

Through personal discussions with the client in which the client's goals and objectives are established, we determine if the model portfolio is suitable to the client's circumstances. Once we determine the suitability of the portfolio, the portfolio is managed based on the portfolio's goal, rather than on each client's individual needs. Clients, nevertheless, have the opportunity to place reasonable restrictions on the types of investments to be held in their account. Clients retain individual ownership of all securities. Our investment recommendations are not limited to any specific product or service offered by a broker dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual fund shares
- United States governmental securities
- Interests in partnerships investing in real estate

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

To ensure that our initial determination of an appropriate portfolio remains suitable and that the account continues to be managed in a manner consistent with the client's financial circumstances, we will:

1. At least semi-annually, we arrange a portfolio review meeting with each client to update the client on their portfolio, discuss economic and market conditions, update their financial plan (if necessary) and provide guidance as to our view on where the markets are going. We also review any changes to the client situation and investment objectives.
2. Be reasonably available to consult with the client either by phone, email or a personal meeting; and
3. Maintain client suitability information in each client's file.

Investment Supervisory Services ("ISS") Individual Portfolio Management

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities: Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

Financial Planning

We provide financial planning services. Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service receive a written report which provides the client with a detailed financial plan designed to assist the client achieve his or her financial goals and objectives.

In general, the financial plan can address any or all of the following areas:

- Personal: We review family records, budgeting, personal liability, estate information and financial goals.
- Tax & Cash Flow: We analyze the client's income tax and spending and planning for past, current and future years; then illustrate the impact of various investments on the client's current income tax and future tax liability.
- Investments: We analyze investment alternatives and their effect on the client's portfolio.

- Insurance: We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- Retirement: We analyze current strategies and investment plans to help the client achieve his or her retirement goals.
- Death & Disability: We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- Estate: We assist the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, review estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and prepare a written report. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney or accountant. If they don't have an attorney or accountant, we will refer them to either or both. Implementation of financial plan recommendations is entirely at the client's discretion.

We also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning and business planning.

- Exchange-listed securities
- Securities traded over-the-counter
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual fund shares
- United States governmental securities
- Interests in partnerships investing in real estate

Typically the financial plan is presented to the client within six weeks of the contract date, provided that all information needed to prepare the financial plan has been promptly provided.

Assets Under Management

As of 12/31/2023, we were actively managing \$257,818,686 of client assets on a discretionary basis and \$15,314,681 of client assets on a non-discretionary basis.

Item 5 Fees and Compensation

Investment Supervisory Services ("ISS") Portfolio Management Fees

The annualized fee for Portfolio Management Services (Model and Individual) will be charged as a percentage of assets under management, according to the following schedule:

<u>Assets Under Management</u>	<u>Annual Fee</u>
\$0 - \$1,000,000	1%
Next \$1,000,000	.75%
Next \$1,000,000	.50%
Over \$3,000,001	Negotiable

Our fees are billed in arrears at the end of each calendar quarter based upon the value (market value or fair market value in the absence of market value), of the client's account at the end of the previous quarter. Fees will be debited from the account in accordance with the client authorization in the Client Services Agreement.

A minimum of \$200,000 of assets under management is required for this service. This account size may be negotiable under certain circumstances. Coordinated Financial Planning may group certain related client accounts for the purposes of achieving the minimum account size and minimizing the annualized fee (Family Aggregation).

Financial Planning Fees

Coordinated Financial Planning's Financial Planning fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client.

Financial Planning Fee Offset: Coordinated Financial Planning reserves the discretion to reduce or waive the minimum fixed fee if a financial planning client chooses to engage us for our Portfolio Management Services and plan maintenance.

The client is billed quarterly in arrears.

General Information

Termination of the Advisory Relationship: A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice unless terminated at the end of a twelve (12) month period (anniversary date).

Mutual Fund Fees/Institutional Fund Fees: All fees paid to Coordinated Financial Planning for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. Our normal practice is to choose funds from a Charles Schwab Institutional format. These funds can normally be purchased or sold with no front-end or back-end commissions. Under certain circumstances, there may be charges for short-term redemption fees of 3 months or less. We

endeavor to choose funds for our portfolios that have minimal internal fees. In fact, internal fees and expenses have a large weighting in our criteria when we choose each individual fund. These internal expenses and fund fees can vary based on what the fund is invested in. When we discuss a recommended model for a client, we discuss the internal expenses that the fund and portfolio has. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Additional Fees and Expenses: In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information. This normally occurs when we sell a client's current stock position to rollover into our portfolio. We endeavor to get the lowest commissions possible for our clients.

Grandfathering of Minimum Account Requirements: Pre-existing advisory clients are subject to Coordinated Financial Planning's minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients.

ERISA Accounts: Coordinated Financial Planning is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. . As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Coordinated Financial Planning may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees.

Advisory Fees in General: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

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

Coordinated Financial Planning does not charge performance-based fees.

Item 7 Types of Clients

Coordinated Financial Planning provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Pension and profit sharing plans (other than plan participants)

- Charitable organizations

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

Methods of Analysis

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Charting. In this type of technical analysis, we review charts of market and security activity in an attempt to identify when the market is moving up or down and to predict how long the trend may last and when that trend might reverse.

Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis. We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement. Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

Asset Allocation. Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Mutual Fund and/or ETF Analysis. We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF,

managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

Risks for all forms of analysis. Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Investment Strategies

We use the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term purchases. We purchase securities with the idea of holding them in the client's account for a year or longer. Typically we employ this strategy when:

- We believe the securities to be currently undervalued, and/or
- We want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Margin transactions. We do not use margin transactions normally, however, we do recommend, when appropriate, margins be established with the custodian. It is possible, from time to time, for a client to raise cash under various circumstances; ie: purchase of a home, car, education, etc. and the client does not want to sell securities at the current time due to market conditions. Margin provides the opportunity to raise the cash needed and the client can pay back at a more favorable time. For our aggressive clients, it may be possible to use margin to enhance their portfolio in an up market. A risk in margin trading is that, in volatile markets, securities prices can fall very quickly. If the value of the securities in your account minus what you owe the broker falls below a certain level, the broker will issue a "margin call", and you will be required to sell your position in the security purchased on margin or add more cash to the account. In some circumstances, you may lose more money than you originally invested.

We do not use margin transactions as an investment strategy. However, we do recommend, where appropriate, that a client establish a margin account with the client's broker. In this situation, if we are selling one stock and purchasing another stock with the proceeds, we can use the margin account to make certain that you are not left out of the purchase if we have difficulty completing the sale.

Risk of Loss. Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. Our firm and our management personnel have no reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Our firm and our related persons are not engaged in other financial industry activities and have no other industry affiliations.

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

Our firm has adopted a Code of Ethics which is designed to comply with Rule 20A-1 under the Investment Advisers Act of 1940 ("Advisors Act").

This Code establishes rules of conduct for all employees of Coordinated Financial Planning Corporation and is designed to, among other things, govern personal securities trading activities in the accounts of employees. The Code is based upon the principle that Coordinated Financial Planning Corporation and its employees owe a fiduciary duty to Coordinated Financial Planning Corporation's client's to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The Code is designed to ensure that the high ethical standards long maintained by Coordinated Financial Planning Corporation continue to be applied. The purpose of the Code is to preclude activities that may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The excellent name and reputation of our firm continues to be a direct reflection of the conduct of each employee.

Pursuant to Section 206 of the Advisors Act, both Coordinated Financial Planning Corporation and its employees are prohibited from engaging in fraudulent, deceptive or manipulative conduct. Compliance with this section involves more than acting with honesty and good faith alone. It means that the Coordinated Financial Planning Corporation has an affirmative duty of utmost good faith to act solely in the best interest of its clients.

Coordinated Financial Planning Corporation and its employees are subject to the following specific fiduciary obligations when dealing with clients:

- The duty to have a reasonable, independent basis for the investment advice provided;
- The duty to obtain best execution for a client's transactions where the Firm is in a position to direct brokerage transactions for the client;

- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs and circumstances; and
- A duty to be loyal to clients.

In meeting its fiduciary responsibilities to its clients, Coordinated Financial Planning Corporation expects every employee to demonstrate the highest standards of ethical conduct for continued employment with Coordinated Financial Planning Corporation. Strict compliance with the provisions of the Code shall be considered a basic condition of employment with Coordinated Financial Planning Corporation. Coordinated Financial Planning Corporation's reputation for fair and honest dealing with its clients has taken considerable time to build. This standing could be seriously damaged as the result of even a single securities transaction being considered questionable in light of the fiduciary duty owed to our clients. Employees are urged to seek the advice of Lonny S. Elfenbein, the Chief Compliance Officer, for any questions about the Code or the application of the Code to their individual circumstances. Employees should also understand that a material breach of the provisions of the Code may constitute grounds for disciplinary action, including termination of employment with Coordinated Financial Planning Corporation.

The provisions of the Code are not all-inclusive. Rather, they are intended as a guide for employees of Coordinated Financial Planning Corporation in their conduct. In those situations where an employee may be uncertain as to the intent or purpose of the Code, he/she is advised to consult with Lonny S. Elfenbein. Lonny S. Elfenbein may grant exceptions to certain provisions contained in the Code only in those situation when it is clear beyond dispute that the interests of our clients will not be adversely affected or compromised. All questions arising in connection with personal securities trading should be resolved in favor of the client even at the expense of the interests of the employees.

The Chief Compliance Officer will periodically report to senior management/board of directors of Coordinated Financial Planning Corporation to document compliance with this Code.

A copy of this Code will be provided upon client request.

As disclosed in the preceding section of this Brochure (Item 10), related persons of our firm are separately registered as securities representatives of a broker-dealer and/or licensed as an insurance agent/broker of various insurance companies. Please refer to Item 10 for a detailed explanation of these relationships and important conflict of interest disclosures.

Item 12 Brokerage Practices

Coordinated Financial Planning requires that clients provide us with written authority to determine the broker-dealer to use and the commission costs, if any, which will be charged to our clients for these transactions.

Clients must include any limitations on this discretionary authority in this written authority statement. Clients may change/amend these limitations as required. Such amendments must be provided to us in writing. Some amendments may not be acceptable to Coordinated Financial Planning and, therefore, reserves the right to reject if the amendment affects our ability to manage accounts.

As a matter of policy and practice, Coordinated Financial Planning does not generally block client trades and, therefore, we implement client transactions separately for each account. Consequently, certain

client trades may be executed before others, at a different price and/or commission rate. Additionally, our clients may not receive volume discounts available to advisers who block client trades.

Coordinated Financial Planning may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although we recommend that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. Coordinated Financial Planning is independently owned and operated and not affiliated with Schwab.

Schwab provides Coordinated Financial Planning with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Institutional. These services are not contingent upon our firm committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For our client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes available to our firm other products and services that benefit Coordinated Financial Planning but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist us in managing and administering our clients' accounts include software and other technology that:

- Provides access to client account data (such as trade confirmations and account statements);
- Facilitates trade execution and allocate aggregated trade orders for multiple client accounts;
- Provides research, pricing and other market data;
- Facilitates payment of our fees from clients' accounts; and
- Assists with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services intended to help us manage and further develop our business enterprise. These services may include:

- Compliance, legal and business consulting;
- Publications and conferences on practice management and business succession;
- Access to employee benefits providers, human capital consultants and insurance providers.

Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to Coordinated Financial Planning. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

Item 13 Review of Accounts

Investment Supervisory Services ("ISS") Model Portfolio Management Services

REPORTS: In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, we provide quarterly reports summarizing account performance, balances and holdings. These reports will also remind the client to notify us if there have been changes in the client's financial situation or investment objectives. Clients are also asked to call with any questions or changes.

REVIEWS: While the underlying securities within Model Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of the investment objectives and guidelines of each model portfolio as well as any investment restrictions provided by the client. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment. These accounts are reviewed by: Stephen H. Perrin, Jr., President/Certified Financial Planner, Matthew B. Beamer, Certified Financial Planner and Joseph T. Perin, Certified Financial Planner.

Financial Planning Services

REPORTS: A great majority of new perspective clients will receive a new, completed financial plan. This is the first step in our process. If after the plan is completed and the client decides not to implement the plan, they will owe the agreed upon fee and no additional reports will be generated. If, however, the client decides to implement the plan and sign an agreement with Coordinated Financial Planning, the plan will be reviewed and updated as needed at the semi-annual meetings.

REVIEWS: Occasionally, special plan reviews may occur; ie. client officially retires, receipt of an inheritance or any other lifestyle change.

Item 14 Client Referrals and Other Compensation

It is Coordinated Financial Planning's policy not to engage solicitors or to pay related or nonrelated persons for referring potential clients to our firm.

It is Coordinated Financial Planning's policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

Item 15 Custody

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, we also send account statements directly to our clients on a quarterly basis. We urge our clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current.

Our firm does not have actual or constructive custody of client accounts.

Coordinated Financial Planning does not have any power to enact first party wire transfers without the client's consent.

The SEC's February 2017 Custody Rule guidance provided clarity about what constitutes custody for RIAs as it relates to certain money-movement authorities. The SEC clarified that having third-party money-movement authority is custody. However, it also provided guidance about how to avoid the surprise exam requirement if seven conditions are followed. Because six of the seven conditions necessitate an advisor's reliance on a qualified custodian, Charles Schwab has updated the majority of our processes and procedures to help advisers comply with these conditions. Coordinated Financial Planning Corporation maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.

Item 16 Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission. Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

Coordinated Financial Planning Corporation requires that it be provided with written authority to determine which securities and the amounts of securities that are bought or sold in a client's account. Clients give us discretionary investment authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

Item 17 Voting Client Securities

As a matter of firm policy, Coordinated Financial Planning Corporation does not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

Coordinated Financial Planning Corporation may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business.

Item 18 Financial Information

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. Coordinated Financial Planning has no additional financial circumstances to report. Coordinated Financial Planning has not been the subject of a bankruptcy petition at any time during the past ten years.