



This brochure provides information about the qualifications and business practices of Parker Financial LLC. If you have any questions about the contents of this brochure, please contact us at (360) 337-2701 or by email at: info@parker-financial.net. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Parker Financial LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Parker Financial LLC's CRD number is: 144293

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Registration does not imply a certain level of skill or training.

Please Initial & Date here: X _____ X _____ **Date:** _____

Version Date: 03/23/2024 Annual Reporting

Item 2: Material Changes

The material changes in this brochure from the last other than annual updating amendment of Parker Financial LLC on **06/12/2023** are described below.

A **material change** includes most items disclosed on the **Form ADV** Part 2A, such as the registered investment adviser firm's services, investment advisory fee arrangements, relationships with related persons and outside entities, **changes** to advisory personnel, and **changes** to the organization.

- Timothy Tenbrink has been hired as a Financial Advisor so has been added to ADV Form 2B
- EQIS Capital changed their name to Freedom Advisors so this has been updated throughout the document.

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Item 4: Advisory Business

A. Description of the Advisory Firm

Parker Financial LLC is a Limited Liability Company organized in the state of Washington. This firm has been in business since July 13, 2007, and the principal owner is Jason Randall Parker. Parker Financial LLC does business as:

Sound Retirement Planning
Sound Retirement Radio
Parker Financial
Insurance Services by Parker Financial, LLC

B. Types of Advisory Services

Parker Financial LLC (hereinafter “PF”) offers the following services to advisory clients:

Investment Supervisory Services

PF offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. PF creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- | | |
|-----------------------|--------------------------------|
| • Investment strategy | • Personal investment policy |
| • Asset allocation | • Asset selection |
| • Risk tolerance | • Regular portfolio monitoring |

PF evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. PF will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Educational Seminars & Newsletter Subscriptions

PF may occasionally provide seminars in areas such as financial planning, retirement planning and estate planning. We may charge a fee for attendance ranging from \$10-\$50 per person. We may also offer workbooks for purchase prior to some seminars for a fee ranging from \$19-\$49. If we are offering workbooks, then attendees are required to purchase one workbook per household to attend the seminar. No other attendance fee will be charged in those instances. A spouse or guest may attend at no additional cost. Additional workbooks are \$19-\$24 each if the spouse or guest would like one. Workbook fees are nonrefundable. Any fees will be published on the seminar announcement or invitation and will be due in advance of the seminar. Payment can be made by check or credit card.

PF may also provide pro-bono seminars at its own discretion. Seminars are offered to organizations and the public on a variety of financial topics. Seminars are always offered on an impersonal basis and do not focus on the individual needs of participants.

PF provides subscriptions to e-newsletters to the public free of charge.

Selection of Other Advisers

PF may direct clients to third-party money managers; Envestnet or Freedom Advisor. PF will be compensated via a fee share from these advisers to which it directs those clients. This relationship will be disclosed in each contract between PF and Envestnet or Freedom Advisor. The fees shared will not exceed any limit imposed by any regulatory agency. Before selecting other advisers for clients, PF will always ensure those other advisers are properly licensed or registered as an investment adviser.

Clients entering into an *Investment Advisory Agreement* with us using Envestnet are consenting to use Envestnet Asset Management ("Envestnet") as a third-party money/platform manager and Fidelity Investment Services as their Custodian/Broker.

Envestnet is a technology provider and SEC Registered Investment Adviser who assists us in portfolio construction, management, practice management and performance reporting for our clients. PF may utilize and/or recommend Third Party Money Managers or Sub-Advisers for a portion or all of their client's assets if suitable and applicable. PF may also recommend that certain clients authorize the active discretionary management of a portion of their assets by independent money managers. PF has entered into a sub-advisory relationship with Envestnet. Envestnet gives us access to specialized tactical & strategic portfolios that primarily utilize diversified baskets of exchange traded funds and mutual funds (portfolios can also include individual equity securities at the discretion of the portfolio manager). Under the sub-advisory arrangement, PF will remain responsible for

determining the client's investment objectives and whether one or more of Envestnet's tactical or strategic programs are suitable to meet such investment objectives. Envestnet is responsible for the discretionary management of the assets which the primary adviser has instructed be invested in one or more of the firm's tactical or strategic programs. Each tactical or strategic program is designed to achieve particular investment goals. Accordingly, the tactical or strategic programs are not tailored to accommodate the needs or objectives of specific clients, but rather, are designed to enable the primary adviser to match clients with a tactical or strategic programs that are consistent with their investment goals and objectives. Due to the nature of the tactical or strategic programs, PF will not be able to impose restrictions on Envestnet's management of the tactical or strategic strategies. However, because Envestnet also offers customized tactical or strategic programs as an investment option, PF may request that Envestnet develop a customized tactical or strategic portfolio that takes into account certain reasonable restrictions. A restriction request, however, may not be honored if it is fundamentally inconsistent with Envestnet's investment philosophy. It is in Envestnet's sole and absolute discretion whether or not to accept such restrictions.

Fees: Fee schedules vary and are published within their own contracts (Statement of Investment Selection) and disclosure documents (Private Wealth Management Program and Conditions), including their respective Form ADV, Part 2. Fees are calculated on a quarterly basis and are payable quarterly in advance. With written notice clients may terminate these contracts at any time

Solicitor Relationships

When acting as a solicitor for Freedom Advisor Management, clients typically receive deeply diversified asset allocations comprising over twenty different asset classes and equity styles, all of which are consolidated onto a single platform in a single account with aggregated online reporting. Investors in the wrap fee program benefit from the institutional style money management within a customized asset allocation. Investors also benefit from the direct ownership of securities.

Through our collaboration with the client, the combination of portfolios is completely customizable, though Freedom Advisor provides recommended allocations based on the client's individual needs, goals and risk tolerance.

Clients entering into an *Investment Advisory Agreement* with us using Freedom Advisor are consenting to use Freedom Advisor Management as a third-party money/platform manager and Goldman Sachs as their Custodian/Broker.

Freedom Advisor is a technology provider and SEC Registered Investment Adviser who assists us in portfolio construction, management, practice management and performance reporting for our clients. PF may utilize and/or recommend Third Party Money Managers or Sub-Advisers for a portion or all of their client's assets if suitable and applicable. PF

may also recommend that certain clients authorize the active discretionary management of a portion of their assets by independent money managers. PF acts as a solicitor for Freedom Advisor. Freedom Advisor gives us access to specialized tactical & strategic portfolios that primarily utilize diversified baskets of exchange traded funds and index mutual funds (portfolios can also include individual equity securities at the discretion of the portfolio manager). Under the sub-advisory arrangement, PF will remain responsible for determining the client's investment objectives and whether one or more of Freedom Advisor's tactical or strategic programs are suitable to meet such investment objectives. Freedom Advisor is responsible for the discretionary management of the assets which the primary adviser has instructed be invested in one or more of the firm's tactical or strategic programs. Each tactical or strategic program is designed to achieve particular investment goals. Accordingly, the tactical or strategic programs are not tailored to accommodate the needs or objectives of specific clients, but rather, are designed to enable the primary adviser to match clients with a tactical or strategic program that is consistent with their investment goals and objectives. Due to the nature of the tactical or strategic programs, PF will not be able to impose restrictions on Freedom Advisor's management of the tactical or strategic strategies. However, because Freedom Advisor also offers customized tactical or strategic programs as an investment option, PF may request that Freedom Advisor develop a customized tactical or strategic portfolio that takes into account certain reasonable restrictions. A restriction request, however, may not be honored if it is fundamentally inconsistent with Freedom Advisor's investment philosophy. It is in Freedom Advisor's sole and absolute discretion whether or not to accept such restrictions.

Fees: Fee schedules vary and are published within their own contracts and disclosure documents, including their respective Form ADV, Part 2. Fees are calculated on a monthly basis and are payable monthly in arrears. With written notice clients may terminate these contracts at any time.

Financial Planning & Investment Consulting

Financial planning includes tax planning, insurance planning, retirement planning and estate planning. Financial planning services may include consultations and/or written plans, which analyze a client's financial situation and make appropriate recommendations for strategies and methods of implementation of the strategies. Investment Consulting may include portfolio review and non-discretionary investment consulting services. Both these services are based on fixed fees and the final fee structure is documented in the *Financial Planning & Investment Consulting Agreement*.

Services Limited to Specific Types of Investments

PF limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, real estate, hedge funds, third party money managers, REITs, insurance products including annuities, private placements, and government securities. PF may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

PF offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent PF from properly servicing the client account, or if the restrictions would require PF to deviate from its standard suite of services, PF reserves the right to end the relationship.

D. Wrap Fee Programs

PF does not participate in any wrap fee programs.

E. Amounts Under Management

PF has the following assets under management:

Discretionary Amounts: \$174,674,474	Non-discretionary Amounts: \$0.00	Date Calculated: 12/31/2023
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Item 5: Fees and Compensation

A. Fee Schedule

Investment Supervisory Services Fees

These fees are negotiable and the final fee schedule is included in the *Investment Advisory Agreement*. Typically PF charges between 0.5% to 2%, depending on the size and complexity of a client's account per year, however PF will occasionally give a friends and family discount. Other exceptions will apply to employees of PF and their relatives, or relatives of existing clients. Fees are paid quarterly in advance when using Investnet/Fidelity. Fees are paid monthly in arrears when using Freedom

Advisor/Goldman Sachs. Clients may terminate their contracts with thirty days' written notice. Refunds are given on a prorated basis, based on the number of days remaining in a quarter for Envestnet/Fidelity or monthly for Freedom Advisor/Goldman Sachs at the point of termination. Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the *Investment Advisory Agreement*. Advisory fees are withdrawn directly from the client's accounts with client written authorization. Clients will receive invoices/billing statements showing the calculated portion of PF's fees that are deducted from their accounts, as well as the other fees outlined below, quarterly from Envestnet/Fidelity or monthly from Freedom Advisor/Goldman Sachs at the time they are deducted.

In addition to Parker Financial's management fee, there are additional fees such as a platform fee, custodian fee, trading costs, SEC fees and these fees are outlined in the *Statement of Investment Selection* and the *Private Wealth Management Program Terms and Conditions* for clients with assets at Fidelity/Envestnet. For clients with accounts at Freedom Advisor/Goldman Sachs these additional fees are disclosed in the *Proposal* and *Investment Policy Statement*.

In all instances, the adviser will send the client a written invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, the time period covered by the fee, and, if applicable, the amount of assets under management on which the fee was based and the name of the custodian(s) on your fee invoice. The adviser will send these to the client concurrent with the request for payment or payment of the adviser's advisory fees. We urge the client to compare this information with the fees listed in the account statement. Envestnet or Freedom Advisor, our third-party money managers as listed below, will collect the total fee from the client and deliver the noted invoice to the client.

Selection of Other Advisers Fees

PF will direct clients to third-party money managers; Envestnet or Freedom Advisor. PF will be compensated via a fee share from the advisers to which it directs those clients. These third-party money managers will charge between 0.2% to 1%* per year depending on the size and complexity of the accounts. Some selections charge a minimum flat fee if the funds invested fall below a certain threshold. When this happens the amount charged can exceed 1% and may extend upwards of 4%. This relationship will be disclosed in each contract between PF and Envestnet or Freedom Advisor. The fees shared will not exceed any limit imposed by any regulatory agency. Fees are collected monthly in arrears for clients using Freedom Advisor and quarterly in advance for clients using Envestnet. Clients may terminate their contracts with ten days written notice. Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination.

Financial Planning & Investment Consulting Fees

Fixed Fees

Depending upon the complexity of the situation and the needs of the client, the rate for creating client financial plans is generally a minimum of \$5,000. Fees are paid in advance, but never more than six months in advance. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination. The fees are negotiable and the final fee schedule will be attached to the *Financial Planning & Investment Consulting Agreement*. Clients may terminate their contracts without penalty within five business days of signing the advisory contract.

To the extent requested by a client, PF may determine to provide limited retirement/investment planning consulting services on a stand-alone separate fee basis. Prior to engaging PF to provide consulting services, clients are required to enter into a *Financial Planning & Investment Consulting Agreement* with PF setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to PF commencing services.

Clients who are only purchasing an insurance product through PF are not required to first enter into a *Financial Planning & Investment Consulting Agreement* and no fee shall be required. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. PF always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of PF in their capacity as an insurance agent.

Financial Planning Fee to create a Retirement Plan Only	\$5000+*
Can include Retirement Budget Calculator Review/Creation & Report, Social Security Timing Report, Asset Allocation Recommendation & Time Segmented Diversification Strategy (as needed).	

Retirement Plan Update/Review after initial creation	\$5000+*
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Seminar Workbook Fee(s)	\$19-\$49
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Special Offers/Discounts Periodically Made Available to above prices	\$0-4500**
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**price range depends on the complexity of plan/work with a minimum of \$5000. The Financial Planning Fee is waived for clients who have brokerage accounts (non-qualified and/or qualified) under our management at Fidelity or Goldman Sachs. Parker Financial LLC also*

reserves the right to charge less depending on the financial ability of the client to pay. Other exceptions will apply to employees of PF and their relatives, or relatives of existing clients.

*** price range depends on the discount offered*

PF clients could pay diverse fees based upon the complexity of the engagement and the level and scope of the overall consulting services to be rendered. As a result of these factors, the services to be provided by PF to any particular client could be available from other advisers at lower fees. All clients and prospective clients should be guided accordingly. PF reserves the right to charge less depending on the financial ability of the client to pay. Other exceptions will apply to employees of PF and their relatives, or relatives of existing clients.

No fees are charged for seminars. However, as stated above in Item 4, we offer workbooks for purchase prior to the seminars for a fee ranging from \$19-\$49. Attendees are required to purchase one workbook to attend a seminar. A spouse or guest may attend at no additional cost. Additional workbooks are \$19-\$24 each if the spouse or guest would like one. If we are hired by larger groups, such as corporations, we reserve the right to charge fees to cover the expenses incurred by us for presenting the seminars. In this case, all fees and payment provisions will be fully disclosed prior to the seminar being presented.

Hourly Fees

PF does not charge an hourly fee.

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in advance.

Payment of Selection of Other Advisers Fees

Fees are collected monthly in arrears for clients using Freedom Advisor and quarterly in advance for clients using Envestnet.

Payment of Financial Planning Fees

Fixed Financial Planning & Investment Consulting fees are paid via check or credit card in advance, but never more than six months in advance. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination. All consulting and financial planning fees are 100% refundable within 30 days of delivery.

C. Clients Are Responsible For Third-Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by PF. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

PF collects fees in advance. Fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. Fees will be returned within fourteen days to the client via check or deposit back into client's account.

E. Outside Compensation For the Sale of Securities to Clients

Neither PF nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

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

PF does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

PF generally provides investment advice and/or management supervisory services to the following types of clients:

Individuals
High-Net-Worth Individuals

Minimum Account Size

There is an account minimum, \$500,000, which may be waived by the investment adviser, based on the needs of the client and the complexity of the situation. Other exceptions will apply to employees of PF and their relatives, or relatives of existing clients.

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

Methods of Analysis and Investment Strategies

Methods of Analysis

PF's primary method of analysis includes fundamental analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Investment Strategies

PF uses long term trading and short term trading strategies. PF primarily recommends ETFs & Mutual Funds for their client's at-risk money.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Risks of Specific Securities Utilized

PF generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities and Affiliations

Registration as a Broker/Dealer or Broker/Dealer Representative

Neither PF nor its representatives are registered as a broker/dealer or as representatives of a broker/dealer.

Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Adviser

Neither PF nor its representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Adviser.

Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Jason Randall Parker and Heather Dawn Hughes-Henrichsen are licensed insurance agents. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. PF always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of PF in their capacity as an insurance agent.

We spend approximately 5% or less of our total time on our insurance product research & recommendations, and less than 30 minutes on this activity, on average, during regular trading hours per day.

Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

PF will direct clients to third party money managers. PF will be compensated via a fee share from the advisers to which it directs those clients. This relationship will be disclosed in each contract between PF and each third party adviser. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that PF has an incentive to direct clients to the third party money managers that provide PF with a larger fee split. PF will always act in the best interests of the client, including when determining which third party manager to recommend to clients. PF will ensure that all recommended advisers or managers are licensed or notice filed in the states in which PF is recommending them to clients.

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

Code of Ethics

Our Code of Ethics establishes ideals for ethical conduct based on fundamental principles of openness, integrity, honesty & trust. Our Code of ethics is divided into two parts: traits and practices you should adhere to and those you must avoid.

I. Traits and Practices You Should Adhere To Best practices):

Integrity, Honesty, Fairness, Competence, Confidentiality, Diligence, Reporting Personal Securities & Holdings, and lastly Educating Employees about our Code of Ethics

II. Practices You Must Avoid:

Discrimination & Harassment, Financial Interests in Other Financial Service Firms, Improper Gifts & Entertainment, Unsuitable Recommendations, Illegal Orders, Borrowing Money, Churning, Discretion, or False or Misleading Advertising

Clients may request a copy of our Code of Ethics from management.

Recommendations Involving Material Financial Interests

PF does not recommend that clients buy or sell any security in which a related person to PF has a material financial interest.

Investing Personal Money in the Same Securities as Clients

From time to time, representatives of PF may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of PF to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. PF will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of PF may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of PF to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker/Dealers

The Custodian was chosen based on their relatively low transaction fees and access to mutual funds and ETFs. PF will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

Research and Other Soft-Dollar Benefits

PF receives no research, product, or service other than execution from a broker-dealer or third party in connection with client securities transactions ("soft dollar benefits").

Brokerage for Client Referrals

PF receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

PF allows clients to direct brokerage. PF may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients money because without the ability to direct brokerage PF may not be able to aggregate orders to reduce transaction costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

Aggregating (Block) Trading for Multiple Client Accounts

PF maintains the ability to block trade purchases across accounts. While block trading may benefit clients by purchasing larger blocks in groups, we do not feel that the clients are at a disadvantage due to the best execution practices of our custodian.

Item 13: Reviews of Accounts

Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client managed accounts are reviewed monthly only by Jason Randall Parker, on a portfolio analysis basis. Jason Randall Parker is the chief adviser and is instructed to

review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at PF are assigned to this reviewer.

All financial planning accounts are reviewed as needed as well as upon financial plan creation and plan delivery by Jason Randall Parker, Sole Member. There is only one level of review and that is the total review conducted to create the financial plan.

Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in the client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least quarterly a written report that details the client's account which will come from the custodian.

Clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

PF sells insurance products to clients and therefore may receive compensation from insurance companies & marketing organizations such as marketing, cost reimbursements on insurance products as well as other compensation such as profit sharing and stock options in the insurance companies. *PF may also receive compensation for referrals to other Third Parties including but not limited to: Long Term Care Insurance, Medigap Policies, etc. Clients are in no way required to implement any insurance through any representative of PF in their capacity as an insurance agent nor as a referral to a Third Party.*

Compensation to Non-Advisory Personnel for Client Referrals

PF does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

PF does not take custody of client accounts at any time. Custody of client accounts is held primarily by the Custodian.

Item 16: Investment Discretion

For those clients' accounts where PF provides ongoing supervision, the client has given PF written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides PF discretionary authority via a limited power of attorney in the *Investment Advisory Contract* and in the contract between the client and the custodian.

Item 17: Voting Client Securities (Proxy Voting)

PF will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

Balance Sheet

PF does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance, and therefore does not need to include a balance sheet with this brochure.

Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither PF nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

Bankruptcy Petitions in Previous Ten Years

PF has not been the subject of a bankruptcy petition in the last ten years.