

# WRAP FEE PROGRAM BROCHURE



## Wrap Fee Program

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This Wrap Fee brochure provides information about the qualifications and business practices of Financial Focus LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 760-431-3040. The information in this Wrap Fee brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Financial Focus LLC (CRD#282177) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**FEBRUARY 8, 2019**

## **Item 2: Material Changes**

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### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

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### **Material Changes since the Last Update**

Since the last filing of this brochure on January 4, 2019, the following has been updated:

- The Part 2B for Barbara Williams has been updated to disclose a forgivable loan from Securities America, Inc.

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## Item 4: Services, Fees and Compensation

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### Firm Description

Financial Focus LLC (“Advisor,” “we,” “our,” or “us”) was formed in 2015 and offers a wrap fee program to our advisory clients. Our wrap fee accounts are managed on an individualized basis according to the client’s investment objectives, financial goals, and risk tolerance. Our firm does not utilize outside portfolio managers. All accounts are managed by our in-house professionals. Our wrap advisory services and fees are further described below.

This disclosure brochure is limited to describing the Program and other information that clients should consider prior to establishing an account in the Program. For a complete description of other programs and services offered by Advisor, clients should refer to Advisor’s Form ADV Part 2A, a copy of which will be provided by Advisor to client upon request.

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### Program Services

Our comprehensive asset management service encompasses asset management as well as providing financial planning/financial consulting to clients. It is designed to assist clients in meeting their financial goals through the use of financial investments. We conduct at least one (1), but sometimes more than one (1) meeting (in person if possible, otherwise via telephone conference) with clients in order to understand their current financial situation, existing resources, financial goals, and tolerance for risk. Based on what we learn, we propose an investment approach to the client. We may propose an investment portfolio, consisting of exchange traded funds, mutual funds, individual stocks or bonds, or other securities. Upon the client’s agreement to the proposed investment plan, we work with the client to establish or transfer investment accounts so that we can manage the client’s portfolio. Once the relevant accounts are under our management, we review such accounts on a regular basis and at least quarterly. We may periodically rebalance or adjust client accounts under our management. If the client experiences any significant changes to his/her financial or personal circumstances, the client must notify us so that we can consider such information in managing the client’s investments.

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### Program Fees

Our annual fees for investment management services shall be based on the market value of the assets under management and shall be calculated as follows:

Assets Under Management	Annual Percentage of assets charged*
Up to \$1,000,000	1.5%
Over \$1,000,000	Negotiable

\*Fees for Accounts under \$1,000,000 are typically charged 1.5% however for more complex portfolios requiring more extensive ongoing research; we reserve the right to charge a maximum of 1.9% annually. Our firm’s fees are billed on a pro-rata annualized basis quarterly in advance based on the value of your account on the last day of the previous quarter. Fees are negotiable based on the complexity and size of the account. Fees will be automatically deducted from your managed account through Schwab. As part of this process, you understand and acknowledge the following:

- Schwab send statements at least quarterly to you showing all disbursements for your account, including the amount of the advisory fees paid to us;
- You provide authorization permitting us to be directly paid by these terms;

- c) If we send a copy of our invoice to you, we send a copy of our invoice to the custodian at the same time we send the invoice to you;
- d) Our invoice includes a legend in accordance with our States' statutes and rules.\*

\*The legend urges the client to compare information provided in their statements with those from the custodian in account opening notices and subsequent statements sent to the client for whom the adviser opens custodial accounts with Schwab.

A wrap fee programs allows our clients to pay a specified fee for investment advisory services and the execution of transactions. The advisory services may include portfolio management, and the fee is not based directly upon transactions in your account. Your fee is bundled with our costs for executing transactions in your account(s). We do not charge our clients higher advisory fees based on their trading activity, but you should be aware that we may have an incentive to limit our trading activities in your account(s) because we are charged for executed trades. By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program elsewhere where a lower advisory fee is charged, but trade execution costs are passed directly through to you by the executing broker.

You may pay custodial fees for accounts held at Custodians with which our firm does not have a relationship, charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. These fees are not included within the wrap-fee you are charged by our firm.

Our investment advisory representatives receive a portion of the advisory fee that you pay us, either directly as a percentage of your overall fee or as their salary from our firm. In cases where our investment advisory representatives are paid a percentage of your overall advisory fee, this may create an incentive to recommend that you participate in a wrap fee program rather than a non-wrap fee program (where you would pay for trade execution costs) or brokerage account where commissions are charged. This is because, in some cases, we may stand to earn more compensation from advisory fees paid to us through a wrap fee program arrangement if your account is not actively traded.

## **Item 5: Account Requirements and Types of Clients**

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### **Account Minimum**

We do not require a minimum to open an account.

### **Types of Clients**

Advisor offers investment advice primarily to individuals, trusts, estates, pension and profit sharing plans and businesses.

## **Item 6: Portfolio Manager Selection and Evaluation**

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### **Portfolio Manager**

Members Barbara Williams, Gloria Foote and Kate Hewell, manage all Program accounts.

In general, all individuals that render investment advice on behalf of Advisor are required to have a college degree and/or five (5) years of equivalent industry experience. In addition, all



advisory representatives must have obtained all required licenses or a professional designation.

Advisor requires that individuals have high standards or morals and ethics and be committed to providing quality investment advice. Additionally, advisory representatives will be required to obtain any required regulatory examinations.

Since all programs are managed by our investment advisor representatives with the same fee structure, there is no conflict of interest regarding portfolio managers.

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**Conflicts of Interest**

In establishing a Program account, client elects to appoint Charles Schwab & Co., Inc. ("Schwab") as the sole and exclusive broker/dealer and Custodian with respect to processing securities transactions for the Program account. Advisor does not maintain custody of client assets.

Securities transactions for Program account(s) are effected without commissions being charged to client. While Advisor makes every attempt to obtain the best execution possible, there is no assurance that it will be obtained. Clients should consider whether or not the appointment of Schwab as the sole broker/dealer and Custodian may or may not result in certain costs or disadvantages to the client as a result of possibly less favorable executions. In considering whether or not to restrict the execution of transactions through Schwab, Advisor considered their capabilities.

Although client will not be charged a transaction charge for transactions through Schwab, client should be aware that Advisor will be required to pay transaction charges to Schwab. The transaction charges borne by Advisor vary based on the type of transactions (e.g., mutual fund, equity or fixed income security) and for mutual funds based on whether or not the mutual fund pays 12b-1 fees and/or subtransfer agent fees that are retained by Schwab in amounts sufficient to cover the majority of trading costs. Client should understand that the cost to Advisor of transaction charges may be a factor the Advisor considers when deciding which securities to select and whether or not to place transactions in a Program account.

No agency-cross transactions or principal transactions are effected by Advisor in Program accounts.

Advisor may aggregate transactions for a client with other clients to improve the quality of execution. When transactions are so aggregated, the actual prices applicable to the aggregated transactions will be averaged, and the client will be deemed to have purchased or sold its proportionate share of the securities involved at the average price obtained.

Advisor may receive support services and/or products from Schwab, which assist the Advisor to better monitor and service Program accounts maintained at Schwab. These support services and/or products may be received without cost, at a discount, and/or at another negotiated rate, and may include investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, consulting services, attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by Advisor in furtherance of its investment advisory business operations. Clients do not pay more for services as a result of this arrangement. There is no corresponding commitment made by the Advisor to Schwab or any other entity to invest any specific amount or percentage of client assets in any specific securities as a result of the arrangement.

Advisor and advisory representatives may receive additional non-cash compensation from product sponsors. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings or marketing or advertising initiatives.

The Program may cost the client more or less than purchasing Program services separately. Factors that bear upon the cost of the Program account in relation to the cost of the same services purchased separately include: the type and size of the account, the historical and/or expected size or number of trades for the account, and the number and range of supplementary advisory and client related services provided to the account.

The Annual Fee is an ongoing fee for investment advisory services and may cost the client more than if the assets were held in a traditional brokerage account. In a brokerage account, a client is charged a commission for each transaction and the representative has no duty to provide ongoing advice with respect to the account. If the client plans to follow a buy and hold strategy for the account or does not wish to purchase ongoing investment advice or management services, the client should consider opening a brokerage account rather than a Program account.

Advisor receives compensation as a result of the client's participation in the Program. The amount of this compensation may be more or less than what Advisor would receive if the client participated in other programs or paid separately for investment advice, brokerage and other client services. Therefore, Advisor may have a financial incentive to recommend the Program account over other programs and services.

Members, have relationships with various insurance companies. In such capacity, they may receive normal and customary commissions as a result of insurance sales outside of Program account.

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### **Advisory Business**

Advisor offers clients an asset management account through the Program in which Advisor directs and manages Program assets for client. Advisor also offers Financial Planning services and Asset Management services offered as a Non Wrap Program described in detail in Form ADV Part 2A. By offering both a Wrap Fee Program and a Non Wrap Fee Program creates a conflict of interest as Advisor may receive higher fees under the Wrap Fee Program. To mitigate this conflict, Advisor and client will determine which Program is best suited for the client. Advisor has a fiduciary duty to act in the best interest of the client and will act according to those duties.

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

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### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities, but rather on a percentage of assets under management.

Advisor does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

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### **Methods of Analysis, Investment Strategies and Risk of Loss**

Advisor may utilize the following when managing client's assets:

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market. Charting analysis involves reviewing charts of market and security activity in an attempt to identify how the market is moving and predict how long the trend will last.

All investment programs have certain risks that are borne by the investor. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with Adviser:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

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**Proxy Voting**

Advisor does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement or Risk Tolerance that documents their objectives and their desired investment strategy.

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**Item 7: Client Information Provided to Portfolio Managers**

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**Description**

Advisor obtains the necessary financial data from the client and assists the client in setting appropriate investment objectives for the Program account. Advisor obtains updated information from the client as necessary in order to provide personalized investment advice to the client.

Client will be required to enter into a written agreement with Advisor in order to establish a Program account. Client will also be required to complete an application with the broker/dealer that will act as Schwab for Program account assets.

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**Item 8: Client Contact with Portfolio Managers**

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**Restrictions**

There are no restrictions placed on clients' ability to contact and consult with the portfolio managers.

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**Item 9: Additional Information**

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**Disciplinary Information**Criminal or Civil Actions

Advisor and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Advisor and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

Advisor and its management have not been involved in legal or disciplinary events related to past or present investment clients.

Broker-Dealer or Representative Registration

Neither Advisor nor any of its employees are affiliated with a broker-dealer.

Futures or Commodity Registration

Neither Advisor nor its employees are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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**Other Financial Industry Activities and Affiliations**

Affiliated persons of Advisor are also registered representatives and investment advisor representatives of an unaffiliated broker-dealer. From time to time they may offer client's

products from these activities. As registered representatives and investment advisor representatives, they may receive separate yet typical compensation in the form of commissions and/or fees for the sale of securities products and advisory services.

Affiliated persons are also an independent insurance agents. From time to time, they offer clients advice or products from this activity. They may receive separate yet typical compensation in the form of commissions for the sale of insurance products.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the client first and will act according to these duties. Clients are not required to purchase any products. Clients have the option to purchase these products through another broker-dealer and/or insurance agent of their choosing.

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### **Code of Ethics Description**

The employees of Advisor have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Advisor employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of Advisor. The Code reflects Advisor and its supervised persons' responsibility to act in the best interest of their client.

One area which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

Advisor's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of Advisor may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Advisor's Code is based on the guiding principle that the interests of the client are our top priority. Advisor's officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

### **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

Advisor and its employees do not recommend to clients securities in which we have a material financial interest.

### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Advisor and its employees may buy or sell securities that are also held by clients. In order to avoid conflicts of interest such as front running of client trades, employees are required to

disclose all reportable securities transactions as well as provide Advisor with copies of their brokerage statements.

The Chief Compliance Officer of Advisor is Barbara Williams. She reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment. Since most employee trades are in products such as mutual funds, government securities, bonds or are small in size, they do not impact the securities markets.

#### Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

Advisor does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Advisor with copies of their brokerage statements.

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### **Review of Accounts**

#### Schedule for Periodic Review of Client Accounts and Advisory Persons Involved

Account reviews are performed monthly or quarterly depending on the nature of the account and client relationship. All reviews are conducted by Kaitlin Hewell. Account reviews are performed more frequently when market conditions dictate.

#### Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

#### Content of Client Provided Reports and Frequency

Clients receive account statements usually on a monthly basis, but no less than quarterly for managed accounts. Advisor does not provide written reports to the client

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### **Client Referrals and Other Compensation**

#### Economic benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

Our firm may recommend that clients establish brokerage accounts with, to maintain custody of Clients' assets and to effect trades for their accounts. Our firm is independently owned and operated and not affiliated with Schwab. Our firm may also recommend that Clients establish accounts with firms other than Schwab or Pershing.

Our firm places trades for its Clients' accounts subject to its duty to seek best execution and its other fiduciary duties. Our firm may use broker-dealers other than Schwab to execute trades for client accounts maintained at Schwab, but this practice may result in additional costs to clients so that we are more likely to place trades through Schwab rather than other broker-dealers. Schwab and Pershing's execution quality may be different than other broker-dealers.

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

Some of the products, services and other benefits provided by Schwab benefit us and may not benefit our firm's client accounts. Our recommendation/requirement that a client place assets

in Schwab's custody may be based in part on benefits provided to us, and not solely on the nature, cost or quality of custody and execution services provided by Schwab.

Schwab also make available to our firm other products and services that benefit us but may not benefit clients' accounts. These benefits may include national, regional or specific to our firm, educational events organized and/or sponsored by Schwab Institutional. Other potential benefits may include occasional business entertainment of personnel of our firm by Schwab Institutional, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist us in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of our fees from its clients' accounts, and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of our firm's accounts, including accounts not maintained at Schwab Institutional. Schwab Institutional also makes available to us other services intended to help our firm manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, they may make available, arrange and/or pay vendors for these types of services rendered to our firm by independent third parties. They may discount or waive fees they 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 us. While, as a fiduciary, Our firm endeavors to act in its clients' best interests, our recommendation/requirement that clients maintain their assets in accounts at Schwab may be based in part on the benefit to our firm of the availability of some of the foregoing products and services and other arrangements 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.

From time-to-time our firm may make an error in submitting a trade order on a client's behalf. When this occurs, we may place a correcting trade with the broker-dealer which has custody of the client's account. If an investment gain results from the correcting trade, the gain will remain in the client's account unless the same error involved other client account(s) that should have received the gain, it is not permissible for the client to retain the gain, or our firm confers with the client and the client decides to forego the gain (e.g., due to tax reasons). If the gain does not remain in the client's account and Schwab is the custodian, Schwab will donate the amount of any gain \$100 and over to charity. If a loss occurs greater than \$100, we will pay for the loss. Schwab will maintain the loss or gain (if such gain is not retained in the client's account) if it is under \$100 to minimize and offset its administrative time and expense. Generally, if related trade errors result in both gains and losses in the client's account, they may be netted.

In connection with the Members of Financial Focus LLC engaging the services Securities America Inc. as its primary broker dealer, Securities America Inc. provided a loans, to the Members (the portion of the loan corresponding to each Member is proportionate to their percentage of ownership). The loan is forgivable over five years so long as the Members of Financial Focus LLC's relationship with Securities America Inc. continues or the extent of production with Securities America Inc. (the "Note"). The Note was intended to assist the

Members with the cost associated with the transition to Securities America Inc. such as moving expenses, leasing space, furniture, staff and termination fees associated with moving accounts, however, Members of Financial Focus LLC does not confirm the use of these payments for such transition costs. The specifics for each IAR's loans will be disclosed in their Part 2B Supplements.

The Note may present a conflict of interest in that an IAR may have a financial incentive to maintain a relationship with Securities America Inc. which may include directing Clients to Securities America Inc. for execution of trades. However, to the extent a Member directs Clients to Securities America Inc. for services, it is because the Member believes that it is in that Client's best interest to do so. Financial Focus LLC has systems in place to review managed accounts for suitability and best execution practices over the course of the advisory relationship.

#### Advisory Firm Payments for Client Referrals

Advisor does compensate for employees for client referrals. The fees charged to the clients are not increased because of the referral fees paid.

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### **Financial Information**

#### Balance Sheet

A balance sheet is not required to be provided because Adviser does not serve as a Schwab for client funds or securities and Advisor does not require prepayment of fees of more than \$1200 per client and six (6) months or more in advance.

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

Advisor has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

#### Bankruptcy Petitions during the Past Ten Years

Neither Advisor nor its management has had any bankruptcy petitions in the last ten years.



**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B

Kaitlin Hewell



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Tel: 760-431-3040  
Facsimile: 760-931-5719

[Kate.hewell@financialfocusllc.com](mailto:Kate.hewell@financialfocusllc.com)

This Wrap Fee brochure supplement provides information about Kaitlin Hewell and supplements the Financial Focus LLC's brochure. You should have received a copy of that brochure. Please contact Kaitlin Hewell if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Kaitlin Hewell (Individual CRD#4863224) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**FEBRUARY 8, 2019**

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

### **Supervised Person Brochure**

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#### **Principal Executive Officer**

##### **Kaitlin (“Kate”) Hewell**

- Year of birth: 1983
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#### **Item 2 Educational Background and Business Experience**

##### **Educational Background:**

- University of California, Davis; BS, Animal Science and Management; 2004

##### **Business Experience:**

- Financial Focus LLC; Member/Investment Advisor Representative; 2015 - Present
  - Kaitlin Hewell – Sole Proprietor; Independent Insurance Agent; 03/2015 - Present
  - Hewell Financial Group, Inc.; President; 2013 – Present
  - Securities America, Inc.; Registered Representative; 2017 – Present
  - National Planning Corporation; Investment Advisor Representative/Registered Representative; 2014 – 2017
  - Hewell Financial Group, Inc.; President/Investment Advisor Representative; 2013 - 2016
  - Purshe Kaplan Sterling Investments; Registered Representative; 2010 - 2014
  - Laguna Financial Group, Inc.; Chief Compliance Officer/Investment Advisor Representative; 2009 - 2013
  - Linsco Private Ledger; Registered Representative; 2007 - 2010
  - William Henry Crew III Wealth Management Group, Inc.; Associate Advisor; 2005 - 2007
  - Ameriprise Financial; Paraplanner; 2004 - 2005
  - IDS Life Insurance Co., Insurance Agent; 2004 - 2005
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#### **Professional Certifications**

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

The 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. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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 insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, 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 three 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:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- 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.

Accredited Investment Fiduciary (AIF): Accredited Investment Fiduciaries are licensed by the Center for Fiduciary Studies, LLC to use the AIF mark. AIF certification requirements:

- Complete training curriculum
- Pass the 60 questions AIF exam with 75% correct answers
- Sign and agree to abide by a code of ethics
- Complete six hours of continuing professional education, four of which are fi360 Training CE
- Maintain current contact information in fi360's designee database
- Submit yearly renewal application with \$325 in annual dues

Accredited Domestic Partnership Advisor<sup>SM</sup> (ADPA<sup>SM</sup>): The curriculum addresses the unique financial planning needs of lesbian, gay, bisexual, and transgender (LGBT) individuals, as well as heterosexual couples who have chosen not to marry. Specifically covered are factors and situations that cause financial planning for domestic partners to be different from financial planning for legally married spouses, including wealth transfer, taxation, retirement planning, and estate planning issues; as well as alternative planning solutions for these situations.

The topics this designation covers involve:

- Wealth Transfers for Domestic Partners
- Federal Taxation Issues for Domestic Partners

- Retirement Planning & Relationship Issues for Domestic Partners
- Planning for Financial, Medical & End-of-life Needs of Domestic Partners

The unique ADPA<sup>SM</sup> core curriculum, evolved and tested for two years in partnership with one of the foremost wealth advisory firms in the country, addresses emerging financial issues of specific concern to domestic partnerships. To qualify, professionals must hold one or more of the following designations: CFP®, CIMA, ChFC, CPA, AAMS®, AWMA®, CRPC®, APMA(SM), or a J.D.

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**Item 3 Disciplinary Information**

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Organization Proceeding: None to report.

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**Item 4 Other Business Activities**

Ms. Hewell is a registered representative and investment advisor representative with Securities America, Inc., a registered broker-dealer and Member FINRA/SIPC and a licensed insurance agent with various companies/agencies. She spends 48 hours per month on this activity. Ms. Hewell may receive normal and customary commissions as a result of securities and insurance transactions and fees for advisory services. In connection with engaging the services Securities America Inc., Securities America Inc. provided a loan of \$115,655, in February of 2018, over 60 months, so long as Ms. Hewell's relationship with Securities America Inc. continues or the extent of production with Securities America Inc. (the "Note"). The Note was intended to assist with the cost associated with the transition to Securities America Inc. such as moving expenses, leasing space, and termination fees associated with moving accounts, however, Ms. Hewell does not confirm the use of these payments for such transition costs.

The Note may present a conflict of interest in that Ms. Hewell may have a financial incentive to maintain a relationship with Securities America Inc. which may include directing Clients to Securities America Inc. for execution of trades. However, to the extent she directs Clients to Securities America Inc. for services, it is because she believes that it is in that Client's best interest to do so.

Ms. Hewell is also an independent insurance agent. Less than 10% of her time is spent on this activity. From time to time, she offers clients advice or products from this activity. She may receive separate yet typical compensation in the form of commissions for the sale of insurance products.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the clients first and clients are not required to purchase any products. Clients have the option to purchase these products through another registered representative, investment advisor and/or insurance agent of their choosing.

Ms. Hewell is the owner of Hewell Financial Group, Inc. This business is solely to own her portion of Financial Focus, LLC. This entity offers no services, therefore, there is no conflict of interest.

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**Item 5 Additional Compensation**

Ms. Hewell receives commission from the sale of securities products and insurance product but she does not receive performance based fees.

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**Item 6 Supervision**

Since Ms. Hewell is the part owner of Financial Focus LLC, she shares in responsibility for supervision and formulation and monitoring of investment advice offered to clients. She will adhere to the policies and procedures as described in the firm's Compliance Manual.

Ms. Hewell can be reached at 760-431-3040.

**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B

Barbara Williams



Office Address:  
1917 Palomar Oaks Way  
Suite 130  
Carlsbad, CA 92008

Tel: 760-431-3040  
Facsimile: 760-931-5719

[barbara.williams@financialfocusllc.com](mailto:barbara.williams@financialfocusllc.com)

This Wrap Fee brochure supplement provides information about Barbara Williams and supplements the Financial Focus LLC's brochure. You should have received a copy of that brochure. Please contact Barbara Williams if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Barbara Williams (Individual CRD#1050277) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**FEBRUARY 8, 2019**

## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

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#### Principal Executive Officer

##### Barbara J Williams

- Year of birth: 1959
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#### Item 2 Educational Background and Business Experience

##### Educational Background:

- Drexel University; BS, Business Administration; 1982

##### Business Experience:

- Financial Focus LLC; Member/CCO/Investment Advisor Representative; 2015 - Present
  - Hovis-Williams, Inc.; Co-Owner; 2015 – Present
  - Securities America, Inc.; Registered Representative; 2017 - Present
  - Self Employed; Certified Financial Planner; 1982 – 2015
  - Financial Focus; Partner/Investment Advisor Representative; 1989 – 2016
  - National Planning Corporation; Investment Advisor Representative/Registered Representative; 2000 – 2017
  - MONY Securities; Registered Representative; 1988 – 2000
  - First Liberty Securities; Registered Representative; 1983 – 1988
  - IDS; Registered Representative; 1982 - 1983
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#### Professional Certifications

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

The 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. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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 insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, 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 three 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:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- 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.

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### **Item 3 Disciplinary Information**

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Organization Proceeding: None to report.

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### **Item 4 Other Business Activities**

Ms. Williams is a registered representative with Securities America, Inc. a registered broker-dealer and Member FINRA/SIPC and a licensed insurance agent with various companies/agencies. She spends approximately 50% of her time on this activity. Ms. Williams may receive normal and customary commissions as a result of securities and insurance transactions. In connection with engaging the services Securities America Inc., Securities America Inc. provided a loan of \$231,309, in February of 2018, over 60 months. In addition, a loan of \$5,000, in January of 2019, which is forgivable over three years so long as Ms. William's relationship with Securities America Inc. continues or the extent of production with Securities America Inc. (the "Note"). The Note was intended to assist with the cost associated with the transition to Securities America Inc. such as moving expenses, leasing space, and termination fees associated with moving accounts, however, Ms. Williams does not confirm the use of these payments for such transition costs.

The Note may present a conflict of interest in that Ms. Williams may have a financial incentive to maintain a relationship with Securities America Inc. which may include directing Clients to Securities America Inc. for execution of trades. However, to the extent she directs Clients to Securities America Inc. for services, it is because she believes that it is in that Client's best interest to do so. Ms. Williams is also an independent insurance agent. Less than 5% of her time is spent on this activity. From time to time, she offers clients advice or products from this activity. She may receive separate yet typical compensation in the form of commissions for the sale of insurance products.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures,



procedures, and the firm's Fiduciary obligation to place the best interest of the clients first and clients are not required to purchase any products. Clients have the option to purchase these products through another registered representative, investment advisor and/or insurance agent of their choosing.

Ms. Williams is Co-Owner of Hovis-Williams, Inc. This business is set up solely to own her portion of Financial Focus, LLC. This entity offers no services, therefore, there is no conflict of interest.

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**Item 5 Performance Based Fee Description**

Ms. Williams receives commission from the sale of securities products, but she does not receive performance based fees.

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**Item 6 Supervision**

Since Ms. Williams is the Chief Compliance Officer of Financial Focus LLC, she is ultimately responsible for all supervision and formulation and monitoring of investment advice offered to clients. She will adhere to the policies and procedures as described in the firm's Compliance Manual.

Ms. Williams can be reached at 760-431-3040.

# **SUPERVISED PERSON BROCHURE**

FORM ADV PART 2B

Gloria Foote



Office Address:  
1917 Palomar Oaks Way  
Suite 130  
Carlsbad, CA 92008

Tel: 760-431-3040  
Facsimile: 760-931-5719

[Gloria.foote@financialfocusllc.com](mailto:Gloria.foote@financialfocusllc.com)

This Wrap Fee brochure supplement provides information about Gloria Foote and supplements the Financial Focus LLC's brochure. You should have received a copy of that brochure. Please contact Gloria Foote if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Gloria Foote (Individual CRD#1023865) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**FEBRUARY 8, 2019**

## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

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#### Principal Executive Officer

##### Gloria D Foote

- Year of birth: 1946
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#### Item 2 Educational Background and Business Experience

##### Educational Background:

- CERTIFIED FINANCIAL PLANNER™

##### Business Experience:

- Financial Focus LLC; Member/Investment Advisor Representative; 2015 – Present
  - G. Foote Financial Services, Inc.; President; 2015 – Present
  - Securities America, Inc.; Registered Representative; 2017 - Present
  - National Planning Corporation; Investment Advisor Representative/Registered Representative; 2000 – 2017
  - Self Employed; Financial Planner; 1983 – 2015
  - Financial Focus; Partner/Investment Advisor Representative; 1989 – 2016
  - National Planning Corporation; Investment Advisor Representative/Registered Representative; 2000 – Present
  - MONY Securities; Registered Representative; 1988 – 2000
  - First Liberty Securities; Registered Representative; 1983 – 1988
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#### Professional Certifications

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

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- 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 insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, 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 three 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:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- 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.

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### **Item 3 Disciplinary Information**

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Organization Proceeding: None to report.

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### **Item 4 Other Business Activities**

Ms. Foote is a registered representative with Securities America, Inc., a registered broker-dealer and Member FINRA/SIPC and a licensed insurance agent with various companies/agencies. She spends 48 hours per month on this activity. Ms. Foote may receive normal and customary commissions as a result of securities and insurance transactions. In connection with engaging the services Securities America Inc., Securities America Inc. provided a loan of \$231,309, in March of 2018, over 60 months, so long as Ms. Foote's relationship with Securities America Inc. continues or the extent of production with Securities America Inc. (the "Note"). The Note was intended to assist with the cost associated with the transition to Securities America Inc. such as moving expenses, leasing space, and termination fees associated with moving accounts, however, Ms. Foote does not confirm the use of these payments for such transition costs.

The Note may present a conflict of interest in that Ms. Foote may have a financial incentive to maintain a relationship with Securities America Inc. which may include directing Clients to Securities America Inc. for execution of trades. However, to the extent she directs Clients to Securities America Inc. for services, it is because she believes that it is in that Client's best interest to do so.

Ms. Foote is also an independent insurance agent. Less than 10% of her time is spent on this activity. From time to time, she offers clients advice or products from this activity. She may receive separate yet typical compensation in the form of commissions for the sale of insurance products.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the clients first and clients are not required to purchase any products. Clients have the option to purchase these products through another registered representative, investment advisor and/or insurance agent of their choosing.

Ms. Foote is owner of G. Foote Financial Services, Inc. This business is set up solely to own her portion of Financial Focus, LLC. This entity offers no services, therefore, there is no conflict of interest.

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**Item 5 Performance Based Fee Description**

Ms. Foote receives commission from the sale of securities products, but she does not receive performance based fees.

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**Item 6 Supervision**

Since Ms. Foote is the part owner of Financial Focus LLC, she shares in responsibility for supervision and formulation and monitoring of investment advice offered to clients. She will adhere to the policies and procedures as described in the firm's Compliance Manual.

Ms. Foote can be reached at 760-431-3040.