

Item 1 – Cover Page

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This brochure provides information about the qualifications and business practices of Finigan Financial Services, LLC. If you have any questions about the contents of this Brochure, please contact us at 703-790-5999 and/or john@finigan.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 Finigan Financial Services, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Any references to Finigan Financial Services, LLC as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.

Item 2 - Material Changes

This is the initial disclosure brochure. Therefore, there are no material changes to disclose.

At least annually, this Item will discuss only specific material changes that are made to the Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

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Brochure Supplements

Item 4 - Advisory Business

Finigan Financial Services, LLC (hereinafter referred to as “FFS”) is an investment advisory firm offering a variety of advisory services customized to your individual needs.

- A. FFS was created in March of 2002. John Finigan is the Managing Member and sole owner. John has been in the financial services industry since 1994. Additional business information about John is disclosed on the Supplemental Brochure attached to this Brochure.
- B. FFS offers the following advisory services. Each of the services is more fully described below.
 - Asset Management Services
 - Financial Planning & Investment Consulting
- C. FFS tailors the advisory services it offers to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities.

FFS will ask you to complete a fact finder or data gathering questionnaire to assist FFS with obtaining information about your financial situation and history. Additionally, FFS will meet with you and conduct an interview and data gathering session to continue the due diligence process. The information gathered by FFS will assist FFS to provide you with the requested services and customize the services to your financial situation. Depending on the services you have requested, FFS will gather various financial information and history from you including, but not limited to:

- ☐ Net worth
- ☐ Investment experience
- ☐ Retirement and financial goals
- ☐ Investment objectives
- ☐ Investment time horizon
- ☐ Risk tolerance
- ☐ Cash flow analysis; income & debt
- ☐ Cost of living needs
- ☐ Education needs
- ☐ Other applicable financial information required by FFS in order to provide the investment advisory services requested.

Clients engaging FFS can expect the following process:

- The first meeting will consist of an initial consultation, and engagement/data review
 - On more meetings may be needed to discuss: investment strategy/asset allocation and legal/tax/insurance/other planning
 - An intermediate initial review will take place within the first 4 to 6 months
 - Ongoing periodic reviews as determined by either you and/or your FFS Advisory Representative
- D. FFS does not participate in any wrap fee programs.

- E. As of January 31, 2011, FFS has assets under management of:
Discretionary Based Accounts: \$52.7 Million
Non-discretionary Based Accounts: \$2.1 Million

Asset Management Services

Upon FFS completing its analysis of your situation, FFS will determine an asset allocation customized to your financial goals, objectives and risk tolerance. In most circumstances, FFS will use models. FFS customizes your portfolio allocation taking into consideration your limitations or restrictions, the market and economy at the time and your financial situation, goals and objectives.

FFS offers asset management on a discretionary and non-discretionary basis. Discretionary authority will be granted by you to FFS by execution of the Asset Management agreement. If you grant FFS discretionary authority, FFS will make changes to the allocation as deemed appropriate by FFS. FFS will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation with you. FFS may actively trade securities and hold such holdings for periods of 30 days or less or maintain positions for longer or shorter term periods.

If you elect to have your accounts managed on a nondiscretionary basis, no changes will be made to the allocation of your account without prior consultation with you and your expressed agreement.

FFS will monitor your account on a continuous basis based upon your specific investment goals, objectives, risk tolerance, and investment time horizon.

In order to have FFS manage or monitor an account you will generally need to establish an account through Royal Alliance Associates, Inc. ("Royal Alliance"). It is important you refer to the disclosures under Item 12, Brokerage Services. Your portfolio may consist of stocks, bonds, CDs, cash, no-load or load mutual funds, and variable annuity or variable life sub-accounts.

You are advised transactions in the account, account reallocations and rebalancing may trigger a taxable event, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts.

Financial Planning and Investment Consulting Services

FFS will assist you with working toward your financial goals and objectives through planning and consultative services involving savings and debt utilization, risk management tools and products, estate and tax strategies. In matters where FFS recognizes the need for services beyond its general practitioner scope, it may refer you to a specialist in matters of law, tax and accounting, insurance, loans and mortgages, or other personal financial related issue requiring the allocation of resources for which FFS is neither competent, licensed, or authorized.

Financial plans and investment recommendations are based on your financial situation at the time and are based on financial information you disclosed to FFS. You are advised that certain

assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. FFS cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review any plan or investment recommendation and update the plan based upon changes in your financial situation, goals, or objectives or changes in the economy. Should your financial situation or investment goals or objectives change, you must notify FFS promptly of the changes. You are advised that advice or guidance on your insurance and other needs may be limited. Therefore, you may need to seek the services of other professionals such as an insurance adviser, attorney and/or accountant.

You are not obligated to implement advice through FFS or Advisory Representatives. Should you implement the plan with FFS's Advisory Representatives commissions or other compensation may be received in addition to the advisory fee paid to FFS.

General Information

You are advised the investment recommendations and advice offered by FFS are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform FFS promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify FFS of any such changes could result in investment recommendations not meeting your needs.

Item 5 - Fees and Compensation

Asset Management Services

- A. Fees are negotiable and are not based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds.

You may make additions to the Account or withdrawals from the Account, provided the Account continues to meet minimum account size requirements. Additional assets deposited into the Account after it is opened will be charged a pro-rata fee based upon the number of days remaining in the then current three month period. Additionally, partial withdrawals from the account will result in a pro-ration of the fee. No fee adjustments will be made for Account appreciation or depreciation.

Account Value	Maximum Annual Fee
\$100,000 to \$250,000	2.00%
\$250,001 to \$500,000	1.75%
\$500,001 to \$1,000,000	1.50%
\$1,000,001 and above	1.25%

FFS may change the above fee schedule upon 30-days prior written notice to you.

- B. Advisory fees will be charged to and collected directly from your Account, provided you have given FFS written authorization. You will be provided with a fee invoice that identifies the advisory fee, the value of the Account and how the fee was calculated. Additionally, you will also be provided with an account statement reflecting the deduction of the advisory fee. If the Account does not contain sufficient funds to pay advisory fees, FFS has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. You may reimburse the account for advisory fees paid to FFS, except for ERISA and IRA accounts.
- C. In addition to the advisory fees above, you will pay transaction fees for securities transactions executed in your account in accordance with the custodian's transaction fee schedule. Additionally, you may pay fees for custodial services, account maintenance fees, transaction fees, and other fees associated with maintaining the Account. Such fees are not charged by FFS and are charged by the product, broker/dealer or account custodian. FFS does not share in any portion of such fees. Additionally, you may pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund they purchase. Such advisory fees are not shared with FFS and are compensation to the fund-manager. You should read the mutual fund prospectus prior to investing.
- D. Fees are payable in arrears on a calendar quarterly basis. Therefore, advisory fees will be due on the first day of each following calendar quarter based on the asset value of your account as of the last business day of the prior quarter. The initial fee will be pro-rated for the first partial quarter if the Account is opened on a day other than the first day of the calendar quarter.
- E. If the account is opened with securities previously purchased through Royal Alliance or an FFS Advisory Representative, Royal Alliance and the Advisory Representative may have already received commissions on the purchase. If the account is opened with cash proceeds from the sale of securities purchased through Royal Alliance or an FFS Advisory Representative, Royal Alliance and/or the Advisory Representative may already have received commissions on the sale.

You are advised Advisory Representatives of FFS are dually registered representatives of Royal Alliance Associates, Inc. ("Royal Alliance"), a registered broker/dealer, member of the Financial Regulatory Association (FINRA) and SIPC. Advisory Representatives of FFS who are Registered Representative may receive trail commissions (i.e. 12b-1 fees) for a period of time as a result of directing securities transactions through Royal Alliance. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as 12b-1 fees. 12b-1 fees come from fund assets, therefore, indirectly from your assets. 12b-1 fees may be initially paid to Royal Alliance and a portion passed to the Advisory Representatives. The receipt of such fees could represent an incentive for the Advisory Representatives to recommend funds with 12b-1 fees over funds that have no fees or lower fees. As a result, there is a potential conflict of interest.

As stated above, FFS recommends mutual funds that pay 12b-1 fees and no-load funds.

You may purchase the securities recommended by FFS directly or through other brokers or agents not affiliated with FFS.

Termination Provisions

You may terminate investment advisory services obtained from FFS, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with FFS. You will be responsible for any fees and charges incurred on your behalf from third parties as a result of maintaining the Account such as transaction fees for any securities transactions executed and Account maintenance or custodial fees. Thereafter, you may terminate investment advisory services during a quarter, you will be charged or refunded (depending whether fees are charged in arrears or advance) a prorated portion of the advisory fee for the quarter up to the date of termination.

Financial Planning and Investment Consulting Services

You are advised that fees for planning services are strictly for planning services. Therefore, you may pay fees and/or commissions for additional services obtained such as asset management or products purchased such as securities or insurance.

FFS offers financial planning and investment advisory consulting on an hourly fee basis. Fees are negotiable and are based on several factors including, the number of planning sessions or meetings you will require, the complexity of the services you requested, the amount of research required of FFS to provide the requested analysis and the frequency of reviews.

Clients will be provided with an estimate of the anticipated cost. Hourly fees will be billed periodically and as agreed upon by client based on time expended by FFS.

Hourly Fee Type	Maximum Fee	Payable
Senior Planner	\$235 per hour	Hourly fees will be billed periodically and as agreed upon by client based on time expended by FFS.
Planner	\$215 per hour	
Advisory Representative	\$195 per hour	
Administrative/Account Processing	\$115 per hour	

Termination Provisions

You may terminate the advisory agreement with FFS within five (5) business days of execution of the advisory agreement. Thereafter, you may terminate the agreement at any time upon FFS's receipt

of your written notice to terminate. You will be responsible for payment to FFS for any research or services FFS performed prior to receipt of your written notice to terminate.

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

This section is not applicable to FFS since FFS does not charge performance based fees.

Item 7 - Types of Clients

FFS's services are geared toward individuals both high net worth (i.e. clients with a net worth of \$1,500,000) and other than high net worth.

FFS generally requires a minimum amount of assets of \$100,000. However, under certain circumstances, FFS may waive the minimum account size requirement and accept accounts less than \$100,000. Such circumstances may include, but not be limited to, additional assets will soon be deposited, client has several managed accounts or client or client's immediate family has other accounts with FFS. You are advised that performance may suffer due to difficulties with diversifying smaller accounts and due to risk controls potentially being compromised. Performance of smaller accounts may vary from the performance of accounts with more dollars invested due to fluctuations in the market that may affect smaller accounts more and the effects of compounding may be greater in larger accounts.

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

- A. FFS conducts fundamental and technical analysis. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns.

FFS utilizes the following resources to conduct research:

- Public subscriptions of financial periodicals and reports (e.g., Barron's, Kiplinger's newsletter)
- Independent financial performance reporting and investment tracking (e.g., MorningStar, Lippers, Standard & Poor's, Schwab Performance Technologies)
- Data sources (Pershing, DST Fan Mail)
- Financial journals (e.g., Bloomberg's, Journal of Financial Planning)
- Quantitative analysis and reporting software packages (MS Excel, Portfolio Center, BetaVest, Merlin, NetX-360, V2020), or other proprietary reports and materials provided by investment management and the mutual fund companies
- Resources available through Royal Alliance
- News and financial reporting sites via the Internet (e.g., Investment News, Big Charts).

- B. You are advised investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by FFS will require you to prepare to bear the risk of loss and fluctuating performance.

FFS does not represent, warrant or imply that the services or methods of analysis used by FFS can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by FFS will provide a better return than other investment strategies.

- C. FFS does not primarily utilize a particular type of security in the management of your account. FFS's managed account contains a variety of securities types (i.e. mutual funds, ETFs, and individual securities).

Item 9 - Disciplinary Information

There is no reportable disciplinary information required for FFS or its management persons that is material to your evaluation of FFS, its business or its management persons.

Item 10 - Other Financial Industry Activities and Affiliations

- A. As previously stated, Advisory Representatives are dually registered as an advisory representative of FFS and as a registered representative of Royal Alliance. You are under no obligation to purchase or sell securities through your Advisory Representative. However, if you choose to implement the plan, commissions may be earned in addition to any fees paid for advisory services. Commissions may be higher or lower at Royal Alliance than at other broker/dealers. Advisory Representatives may have a conflict of interest in having you purchase securities and/or insurance related products through Royal Alliance in that the higher their production with Royal Alliance the greater potential for obtaining a higher pay-out on commissions earned.

Under the rules and regulations of the FINRA, Royal Alliance has an obligation to perform certain supervisory functions regarding certain activities engaged in by advisory representatives who are also registered representatives of Royal Alliance. For such supervisory functions, FFS may pay Royal Alliance a portion of the advisory fees they receive. Royal Alliance and FFS are not affiliated.

FFS attempts to mitigate the conflicts of interest with the potential receipt of commissions if recommendations are implemented by providing you with these disclosures. Further, you are encouraged to consult other professionals and may implement recommendations through other financial professionals. Furthermore, as a registered representative with Royal Alliance, Advisory Representatives are subject to a supervisory structure at Royal Alliance for his securities business.

B, C. FFS is not and does not have a related person who is a: futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. Further, FFS is not and does not have a related person who is: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; lawyer or law firm; insurance company or agency; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

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

Code of Ethics

- A. FFS has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. FFS takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as FFS's policies and procedures. Further, FFS strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides you with FFS's Privacy Policy. As such, FFS maintains a code of ethics for its Advisory Representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, FFS's Code of Ethics establishes FFS's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.
- B. Neither FFS nor its associated persons recommends to clients or buys or sells for client accounts any securities in which we have a material financial interest.
- C. FFS and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, FFS and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold you. FFS and its associated persons will not put their interests before your interest. FFS and its associated persons may not trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.

FFS has established the following restrictions in order to ensure its fiduciary responsibilities:

- 1) Advisory Representatives shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her affiliation with the Adviser or Royal Alliance, unless the information is also available to the investing public on reasonable inquiry. No person shall prefer his/her own interest to that of the advisory client.
- 2) All clients are fully informed that certain individuals may receive separate compensation when effecting transactions during the implementation process.

- 3) Adviser emphasizes the unrestricted right of the client to decline to implement any advice rendered, except in situations where a Third Party Advisory Service is granted discretionary authority in the client's account.
 - 4) Adviser requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
 - 5) Any individual not in observance of the above may be subject to termination.
- D. FFS is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

You have the right to decline any investment recommendation. FFS and its associated persons are required to conduct their securities and investment advisory business in accordance with all applicable Federal and State securities regulations.

Item 12 - Brokerage Practices

As previously stated, Advisory Representatives are registered representatives of Royal Alliance. As a result they are subject to FINRA Conduct Rule 3040 which may restrict them from conducting securities transactions away from Royal Alliance unless Royal Alliance provides him with written authorization. Therefore, you are advised that FFS Advisory Representatives may be limited to conducting securities transactions through Royal Alliance and its clearing firm Pershing Investments, LLC or those broker/dealers approved by Royal Alliance.

You are advised that not all investment advisers require you to maintain accounts at a specific broker/dealer. You are advised you may maintain accounts at another broker/dealer. However, the services provided by FFS will be limited to only advice and will not include implementation. If you who select another brokerage firm for custodial and/or brokerage services you will not be able to receive asset management services from FFS.

In initially selecting Royal Alliance, FFS conducted due diligence. FFS's evaluation and criteria includes:

- Ability to service you
- Staying power as a company
- Industry reputation
- Ability to report to you and to FFS
- Availability of an efficient trading platform
- Products and services available
- Technology resources
- Educational resources
- Execution capability
- Financial responsibility and viability
- Confidentiality and security of your information
- Responsiveness

- Other factors that may bear on the overall evaluation of best price and execution

Additionally, periodically FFS will review transaction costs in light of current market circumstances, available published statistical analysis as well as other relevant information.

Best execution does not simply mean the lowest transaction cost. Therefore, no single criteria will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the currently utilized custodian.

You are advised there is an incentive for FFS and the Advisory Representatives to recommend a broker/dealer over another based on the products and services that will be received rather than your best interest.

Royal Alliance has a wide range of approved securities products for which Royal Alliance performs due diligence prior to selection. FFS's registered representatives are required to adhere to these products when implementing securities transactions through Royal Alliance. Commissions charged for these products may be higher or lower than commissions you may be able to obtain if transactions were implemented through another broker/dealer. Royal Alliance also provides Advisory Representatives, and therefore the FFS, with back-office operational, technology, and other administrative support. Other services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. Such services are intended to help Advisory Representatives and FFS manage and further develop its business enterprise.

Royal Alliance and its clearing broker/dealer, Pershing, LLC also make available to FFS other products and services that benefit FFS but may not directly benefit you. Some of these other products and services assist FFS with managing and administering your accounts. These include software and other technology that provide access to your account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data; facilitate payment of FFS's fees from your accounts; and assist with back-office functions; record-keeping and client reporting. Many of these services generally may be used to service all or a substantial number of FFS's accounts, including accounts not held through Royal Alliance.

FFS may aggregate ("bunch") transactions in the same security on behalf of more than one client in an effort to strive for best execution and to possibly reduce the price per share and/or other costs to clients. However, aggregated or bunched orders will not reduce the transaction costs to participating clients. FFS conducts aggregated transactions in a manner designed to ensure that no participating client is favored over another client. Participating clients will obtain the average share price per share for the security executed that day. To the extent the aggregated order is not filled in its entirety and when possible, securities purchased or sold in an aggregated transaction will be allocated on a random basis. Under certain circumstances, the amount of securities maybe increased or decreased to avoid holding odd-lot or a small number of shares for particular clients.

Item 13 - Review of Accounts

If you are participating in the Asset Management Services you will be invited to participate in at least an annual review. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Your Advisory Representative will monitor for changes or shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested, and market shifts and corrections.

The following individuals conduct reviews:

John Finigan, Member, Chief Compliance Officer

Lanie Nikes, Advisory Representative

You are advised that you must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require him review the portfolio allocation and make recommendations for changes.

You will be provided statements at least quarterly direct from the account custodian. Additionally, you will receive confirmations of all transactions occurring direct from the account custodian. At least annually when you attend the annual review, FFS will provide you with a consolidated report of your managed account. You should compare the report with statements received direct from the account custodian. Should there be any discrepancy the account custodian's report will prevail.

If you are participating in Financial Planning and Investment Consulting services you will not receive regular reviews. FFS recommends you have at least an annual review and update to any plans. However, the time and frequency of the reviews is solely your decision. Additionally, you will be charged review fees based on the fee schedule disclosed under the program. Other than the initial plan or analysis, there will be no other reports issued.

Item 14 - Client Referrals and Other Compensation

- A. Product vendors recommended by FFS may provide monetary and non-monetary assistance with client events, provide educational tools and resources. FFS does not select products as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. FFS's due diligence of a product does not take into consideration any assistance it may receive. Therefore, this is not considered a conflict of interest but a benefit for you and FFS.
- B. FFS does not directly or indirectly compensate any person who is not a supervised person of FFS for referrals. Further, FFS does not receive an economic benefit from a non-client for providing investment advice or advisory services to you.

Item 15 - Custody

With the exception of deduction of FFS's advisory fees from your accounts, FFS does not take custody of your funds or securities.

Item 16 - Investment Discretion

You may grant FFS authorization to manage your account on a discretionary basis. Discretionary authority will give CCM the authority to buy, sell, exchange, convert securities in your managed accounts. You will grant such authority to FFS by execution of the advisory agreement. You may terminate discretionary authorization at any time upon receipt of written notice by FFS.

Additionally, you are advised that:

- 1) You may set parameters with respect to when account should be rebalanced and set trading restrictions or limitations;
- 2) Your written consent is required to establish any mutual fund, variable annuity, or brokerage account;
- 3) FFS requires the use of the broker/dealer with which your Advisory Representative is registered for sales in commissionable mutual funds or variable annuities, if you elect to implement recommendations through your Advisory Representative;
- 4) With the exception of deduction of FFS's advisory fees from the account, if you have authorized automatic deductions, FFS will not have the ability to withdraw your funds or securities from the account.

Item 17 - Voting Client Securities

FFS does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact FFS about questions you may have an opinions on how to vote the proxies. However, the voting and how you vote the proxies is solely your decision.

Item 18 - Financial Information

FFS will not require you to prepay more than \$1,200 and six or more months in advance of receiving the advisory service.

Item 19 - Requirements for State Registered Advisers

This section is not applicable to FFS. FFS is not state registered. FFS is registered with the Securities and Exchange Commission.