

Form ADV Part 2A
Disclosure Brochure

The Financial Planning Group, Inc.

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This brochure provides information about the qualifications and business practices of The Financial Planning Group, Inc. (FPG) If you have any questions about the contents of this brochure please call us at (952) 853-2233 or email us at clanghoff@unitedplanners.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about FPG is available on the SEC's website at www.adviserinfo.sec.gov.

Registration or licensing as an investment advisor does not imply a certain level of skill or training.

Item 2. Material Changes

This Form ADV Part 2A Disclosure Brochure has been created to comply with requirements adopted by the SEC on July 28, 2010. This document is substantially different in format and content than our previous disclosure brochure and includes certain information that we were not previously required to disclose. Therefore, you should read it carefully and contact us if you have any questions regarding its content.

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Item 4. Advisory Business

The Financial Planning Group

This brochure provides information about the qualifications and business practices of The Financial Planning Group, Inc. (**FPG**). FPG is an investment advisory firm registered with the United States Securities and Exchange Commission (**SEC**) that provides comprehensive financial planning and investment management services to its clients. Please contact Dana D. Anderson if you have any questions about this brochure.

FPG has been in business as an investment advisor since 1996. FPG offers personalized investment advisory services to clients based on the individual needs of the client. Factors that FPG considers in managing client accounts or making recommendations include the client's financial situation, investment objectives and risk tolerance levels, goals and objectives. FPG's services and fee arrangements are described in the following sections of this brochure.

Investment Supervisory Services:

FPG provides continuous advice to a client regarding investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, FPG develops a client's personal investment policy and creates and manages a portfolio based on that policy. FPG will manage advisory accounts on a discretionary or non-discretionary basis. Account supervision is guided by the stated objectives of the client (i.e., maximum capital appreciation, growth, income, or growth and income).

FPG will create a portfolio consisting primarily of exchange traded funds ("ETFs"), and no-load and load-waived mutual funds. FPG may also recommend individual equities, bonds, and other investment product where appropriate to the needs of the client. FPG will allocate the client's assets among various investments taking into consideration the overall management style selected by the client. The mutual funds will be selected on the basis of any or all of the following criteria: the fund's performance history; the industry sector in which the fund invests; the track record of the fund's manager; the fund's investment objectives; the fund's management style and philosophy; and the fund's management fee structure. Portfolio weighting between funds and market sectors will be determined by each client's individual needs and circumstances. Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Clients will retain individual ownership of all securities.

When appropriate to the needs of the client, FPG may recommend the use of option writing. Because this investment strategy involves certain additional degrees of risk, they will only be recommended when consistent with the client's stated tolerance for risk.

As of December 31, 2010, FPG managed \$40 million in discretionary accounts and \$15 million in non-discretionary accounts.

Financial Planning Services

FPG also provides advice in the form of a Financial Plan. Clients purchasing this service will receive a written report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

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

PERSONAL: Family records, budgeting, personal liability, estate information and financial goals.

EDUCATION: Education IRAs, financial aid, state savings plans, grants and general assistance in preparing to meet dependent's continuing educational needs through development of an education plan.

TAX & CASH FLOW: Income tax and spending analysis and planning for past, current and future years. FPG will illustrate the impact of various investments on a client's current income tax and future tax liability.

DEATH & DISABILITY: Cash needs at death, income needs of surviving dependents, estate planning financial analysis and disability income analysis.

RETIREMENT: Analysis of current strategies and investment plans to help the client achieve his or her retirement goals.

INVESTMENTS: Analysis of investment alternatives and their effect on a client's portfolio.

ESTATE: Analysis of financial issues with respect to living trusts, wills, estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law.

INSURANCE: Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.

FPG gathers required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals and attitudes towards risk. Related documents supplied by the client are carefully reviewed, including a questionnaire completed by the client, and a written report is prepared.

Financial Planning recommendations are not limited to any specific product or service offered by a broker dealer or insurance company. All recommendations are of a generic nature.

If the client wishes, and to the extent possible, FPG would be available to assist in the implementation of this plan. Once the financial plan is presented to the client, implementation of the financial plan recommendations is entirely at the client's discretion.

Changes to Financial Status

Clients may consult with FPG at any time concerning their account. Every client is urged to notify FPG as soon as is practicable of changes in financial status or goals, as these types of changes may affect our recommendations.

Item 5. Fees and Compensation

Investment Supervisory Services Fees

The annual fee for FPG's Investment Supervisory Services ranges from 0.25% to 1.00% of assets under management, depending on the nature and complexity of each client's circumstances. FPG will quote an exact percentage to each client based on both the nature and total dollar value of that account

Clients will be invoiced and fees will be directly debited from client accounts in advance at the beginning of each calendar quarter based upon the value (market value or fair market value in the absence of market value), of the client's account at the end of the previous quarter. Fees will be debited from the account in accordance with the client authorization in the Client Services Agreement.

Financial Planning Services Fees

Financial Planning fees will be charged in one of two ways:

1. As a fixed fee, typically ranging from \$1,000 - \$5,000, depending on the nature and complexity of each client's circumstances. Up to 50% of this fee may be due upon signing the Financial Planning agreement, with the balance due upon presentation of the financial plan to the client.
2. On an hourly basis, ranging from \$150 - \$300 per hour, depending on the nature and complexity of each client's circumstances, as well as the individual conducting the work. If appropriate, an estimate for total hours may be determined at the start of the advisory relationship. Up to 50% of the estimated fee

may be due upon signing the advisory agreement, with the balance (based on actual hours) due upon presentation of the plan to the client.

For clients who engage FPG for Investment Supervisory Services, all Financial Planning fees will be offset against the investment management fee.

Implementation of Financial Planning Recommendations

Financial planning services are prepared and the client may be given the option of implementing certain recommendations made within the plan through FPG or FPG's IARs. If clients elect to have an IAR of FPG implement the advice provided as part of the financial planning services, implementation will be made through the client's IAR in the IAR's capacity as a registered representative (**RR**) of United Planners Financial Services of America (**United Planners**) or as an independent insurance agent. When clients implement recommended transactions through the IAR in one of these separate capacities, the IAR will receive additional compensation in the form of commissions, 12B-1 service fees and/or insurance trail fees. This receipt of additional compensation from the implementation of investment advisory recommendations can conflict with the fiduciary duties owed to clients by an investment advisor. Investment advisory clients are under no obligation to purchase from their FPG IAR any commissionable securities or insurance products that he or she recommends and may purchase such products from the broker-dealer or insurance company or agent of their choice. When clients purchase commissionable securities or insurance products from a FPG IAR, FPG may waive or reduce the amount of the financial planning or investment advisory fee as a result of the additional fees and/or commissions being earned. Any adjustment to the financial planning fee is at the discretion of FPG and will be disclosed to the client prior to implementing transactions.

Commissions may be higher or lower at United Planners than at other broker/dealers. RRs are restricted to only offering those products and services that have been reviewed and approved for offering to the public by United Planners and for which United Planners has obtained a selling agreement.

While FPG has procedures in place that endeavors to at all time to put the interest of the clients first as a part of FPG's fiduciary duty, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.

General Information on Fees and Services:

Termination of Advisory Relationship

A client agreement may be cancelled at any time, by either party, for any reason upon receipt of 30 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

Mutual Fund and Other Internal Investment Charges

When recommending mutual funds in its portfolio management service, FPG generally recommends only no-load or load-waived mutual funds. However, all mutual funds, exchange traded funds and other investment company securities (**Funds**) incur certain types of charges and expenses, which are paid from the value of the Funds' shares. These charges and expenses include investment management, transaction, administrative, distribution, transfer agent, custodial, legal, audit and other customary fees. If a client's account holds any such Fund shares, the client will be indirectly paying these expenses, which are in addition to the client's portfolio management fee. Clients are encouraged to read the prospectuses of any Funds which are purchased in their account for a more complete explanation of these fees and expenses.

Some mutual funds pay SEC Rule 12b-1 fees to broker-dealers for providing record keeping, shareholder communication and other services on behalf of the mutual fund. For client accounts held at United Planners and Pershing (unless the account is a qualified account under ERISA), United Planners will receive any 12b-1 fees that are paid by mutual funds purchased in the account. In turn, United Planners pays any 12b-1 fees it receives to the client's FPG IAR in the FPG IAR's capacity as a broker-dealer.

Registered Representative (**RR**) of United Planners. The receipt by the FPG IAR of this additional financial compensation for recommending mutual funds that pay 12b-1 fees over those that do not is a conflict of interests between the FPG IAR and the client and could cause the FPG IAR to recommend an investment based on the compensation received rather than on the client's needs. The FPG IAR is required to inform clients whenever recommended mutual funds pay 12b-1 fees that the FPG IAR will receive. Clients may determine the amount and type of all fund expenses, including 12b-1 fees, by reviewing the fund's prospectus.

Clients should also be aware that the portfolio management fee described above will be imposed on all Fund shares that the client designates as portfolio management assets and place in their portfolio management account, including Fund shares on which they may have previously paid a sales charge. Clients may also be charged redemption fees from mutual funds that were redeemed in order to participate in the portfolio management service.

Brokerage and Custodial Charges

In addition to FPG's management fee, clients will also pay any custodial or ancillary costs associated with their account. For more information about FPG's brokerage recommendations and arrangements, please refer to Item 12 of this brochure.

Tax Consequences of Transactions

Clients are advised that any redemptions and exchanges between Funds and other securities transactions in the clients portfolio management account might have tax consequences, which clients should discuss with their independent tax advisor.

Negotiability of Fees

All fees may be negotiable in certain circumstances. In addition, affiliated persons of FPG and family members and personal acquaintances of FPG's affiliated persons may receive advisory services at a discounted rate which is not available to advisory clients generally.

FPG believes its fees are competitive with fees charges by other investment advisers for comparable services, but comparable services may be available from other sources for lower fees than those charged by FPG. Clients are provided statements from their selected custodian that reflect all account activity, including FPG management fee billing, and are responsible for verifying the accuracy of the fees and charges by the custodian and/or FPG.

Other Important Information

Investments Available without FPG's Services

With certain exceptions, clients can purchase shares of Funds outside of their portfolio management account without paying for and receiving the benefit of the portfolio management services. Certain Funds are offered generally to the public without a sales charge and, for those Funds that are offered with a sales charge, the sales charge described in the Fund's Prospectus may be more or less than the portfolio management fee.

Changes to Financial Status

Clients may consult with FPG at any time concerning their account. Every client is urged to notify FPG as soon as is practicable of changes in financial status or goals, as these types of changes may affect our recommendations.

Verification of and Reliance on Client's Information

In performing its services, FPG shall not be required to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) and is expressly authorized to rely on such information.

No Assignment

Neither FPG nor the client may assign the client's agreement without written consent of the other party.

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

FPG does not charge fees based on a share of capital gains up or capital appreciation of the assets in a client's account.

Item 7. Types of Clients

FPG offers its advisory services, where appropriate, to individuals, high net worth individuals, trusts, estates, charitable organizations and corporations or other business entities.

FPG generally requires \$100,000 of assets under management for Investment Supervisory Services. This account size may be negotiable under certain circumstances. FPG may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee. FPG will quote an exact percentage to each client based on both the nature and total dollar value of that account.

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

Methods of Analysis

FPG primarily uses charting, fundamental analysis and cyclical analysis when developing recommendations for clients. FPG utilizes various computer software programs to assist in both fundamental and technical analysis research, including Albridge and Morningstar. In addition, FPG may use other commercially available software and/or databases to obtain additional information on companies and mutual funds that may be recommended to clients.

The main sources of information FPG uses include financial newspapers and magazines, research materials prepared by others available through the internet and otherwise, corporate ratings services, annual reports, prospectuses and other filings with the Securities and Exchange Commission, as well as company press releases.

Investment Strategies

The investment strategies offered by FPG are tailored to suit the investment objectives of each client. Investment strategies employed are almost exclusively long-term in nature, although occasionally short-term requirements will dictate a different approach, such as short-term purchases or option writing.

Risk of Loss

All investments and investment programs have certain risks that are associated with them and which the investor must bear. Following are the types of risk that may arise to clients due to the types of securities that are recommended to or purchased for clients or as a result of the investment strategies used by FPG:

Business Risk – the risk that the price of an investment will change due to factors unique to that company, investment or market segment and not the market in general.

Liquidity Risk – the risk associated with the ease of being able to quickly convert the value of a security into an equivalent amount of cash. For example, money market funds are readily convertible (liquid) while certain limited partnership units or real estate are not.

Financial Risk – the risk to specific companies' future earnings due to their use of debt. Companies that borrow money must pay it back at some future date, plus the interest charges. This increases the uncertainty about the company because it must have enough income to pay back this amount at some time in the future.

Exchange Rate (Currency) Risk – the risk that investors in foreign investments may be subject to different exchange rates at the time they wish to convert investment proceeds back to their home currency. If exchange rate risk is high, even though substantial profits may have been made in the foreign markets, a less favorable exchange rate may reduce or eliminate these profits.

Country (Political) Risk – the risk that a major change in the political or economic environment of a foreign country may devalue investments made in that country. This risk is usually restricted to emerging or developing countries that do not have stable economic or political environments.

Market Risk – the risk that the price of a particular investment will change as a result of overall market conditions that are not specific to that particular company or investment.

Interest Rate Risk – the risk that interest rate changes will affect the price of a particular investment. For example, when interest rates rise, the price of bonds generally fall.

Item 9. Disciplinary Information

Mr. Anderson was charged with possession of pornographic works. The charges were dismissed with no adjudication of guilt. The court ruled the power to stay adjudication is to be "relied upon sparingly and only for the purpose of avoiding an injustice resulting from the prosecutor's clear abuse of discretion "in the exercise of the charging function." Foss, 556 N.W.2d at 541

Item 10. Other Financial Industry Activities and Affiliations

United Planners

Dana D. Anderson is a registered representative with United Planners Financial Services of America (United Planners), a broker-dealer and member of FINRA. In this capacity, Mr. Anderson may offer clients certain securities products provided by United Planners. See Item 5 above for more information about this affiliation, including conflicts of interest.

United Planners is a Limited Partnership in which Dana Anderson is also a limited partner. Limited partners receive a percentage of United Planners' net profit on an annual basis. This presents a potential conflict between the interests of Brian Dana Anderson and the client because limited partners may recommend products or services that produce more revenue for the firm and thus increase their annual profit distribution.

Insurance Companies

Dana Anderson is also a licensed insurance agent with various insurance companies and may, from time to time, receive incentive awards for the recommendation/introduction of insurance products. The receipt of this compensation may affect FPG's judgment in recommending products to its clients. Please see Item 5 above for more information about Mr. Anderson's insurance activities, including conflicts of interest.

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

Code of Ethics

FPG has adopted a Code of Ethics which sets forth high ethical standards of business conduct that FPG requires of its employees, including compliance with applicable federal securities laws. Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by FPG's access persons. Among other things, FPG's Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code provides for oversight, enforcement and recordkeeping provisions. A copy of FPG's Code of Ethics is available to FPG's advisory clients upon request to the Chief Compliance Officer at FPG's principal office address.

Participation or Interest in Client Transactions and Personal Trading

FPG or individuals associated with FPG may buy or sell securities identical to or different than those recommended to clients for their personal accounts. In addition, any related person(s) may have an interest or position in securities which may also be recommended to a client.

It is the expressed policy of FPG that no person employed by FPG may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

As these situations represent a conflict of interest, FPG has established the following restrictions in order to ensure its fiduciary responsibilities:

- (1) A director, officer or employee of FPG will not buy or sell securities for his or her personal portfolio(s) where such decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No person of FPG shall prefer his or her own interest to that of the advisory client.
- (2) FPG maintains a list of all securities holdings for itself, and anyone associated with this advisory practice with access to advisory recommendations. Dana Anderson of FPG reviews these holdings on a regular basis.
- (3) FPG emphasizes the unrestricted right of the client to decline to implement any advice rendered, except in situations where FPG is granted discretionary authority of the client's account.
- (4) FPG emphasizes the unrestricted right of the client to select and choose any broker or dealer and/or insurance company (s)he wishes.
- (5) FPG requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
- (6) Any individual not in observance of the above may be subject to termination.

Item 12. Brokerage Practices

Recommendation of Broker/Dealers for Investment Supervisory Services

FPG participates in Schwab Advisor Services (SAS) program offered to independent investment advisers by Charles Schwab & Co., Inc. (Schwab) and requires clients who wish to use FPG's Investment Supervisory Services to direct us to use Schwab. Because Dana Anderson is a registered representative with United Planners, he (and, therefore, FPG) is subject to certain United Planners restrictions concerning his use of other custodians and broker-dealers. To fulfill certain FINRA requirements, United Planners has established a list of custodian and brokerage firms which may be utilized for custody of and trade execution in client accounts by its registered representatives who are also affiliated with an investment advisor. Schwab is on this list of broker-dealer/custodians that are acceptable to United Planners.

United Planners will retain a portion of FPG's investment management fee as a charge to FPG (not the client) for the above-referenced functions United Planners' is required to carry out by FINRA. This fee will not increase execution or brokerage charges to the client or the fee the client has agreed to pay FPG pursuant to the client's advisory agreement.

Clients should be aware of the following important facts regarding FPG's exclusive use of SCHWAB:

- This limitation on the use of broker-dealers may affect FPG's ability to achieve most favorable execution of client transactions, and therefore may cost clients more money; and
- Not all investment advisors require clients to use specified broker-dealers.

As part of the SAS program, FPG receives benefits that it would not receive if it did not offer investment advice. SAS provides FPG with access to its institutional trading and operations services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors at no charge to them so long as a total of at least \$10 million of the advisor's clients' account assets are maintained at Schwab. SAS's services include research, brokerage, custody, access to mutual funds and other investments that are otherwise available only to institutional investors or would require a significantly higher minimum initial investment.

SAS also makes available to FPG other products and services that benefit FPG but may not benefit its clients' accounts. Some of these other products and services assist FPG in managing and administering

clients' accounts. These include software and other technology 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 FPG's fees from its clients' accounts, and assist with back-office support, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of FPG accounts, including accounts not maintained at SAS.

SAS may also provide FPG with other services intended to help FPG manage and further develop its business enterprise. These services may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, Schwab may make available, arrange and/or pay for these types of services to FPG by independent third parties. SAS may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to FPG.

FPG's clients must evaluate any recommended broker-dealer and/or custodian, including Schwab, before opening an account. The factors considered by FPG when making brokerage and/or custodial recommendations are the firm's ability to provide professional services, FPG's experience with the firm, the firm's reputation, and the firm's quality of execution services and costs of such services, among other factors.

FPG will block trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block. Block trading allows FPG to execute equity trades in a more timely, equitable manner and to reduce overall commission charges to clients. No personal trades will ever be included in any client blocks. Advisory clients who elect not to grant investment discretion to FPG may not be able to have trades blocked with discretionary clients.

Recommendation of United Planners for Implementation of Financial Planning Recommendations

Because Dana Anderson and FPG's IARs are registered representatives with United Planners, if a client freely chooses to implement financial planning recommendations through them in their capacity as a registered representative, then United Planners will be the broker-dealer that is used.

United Planners has a wide range of approved securities products for which United Planners performs due diligence prior to selection. United Planners' registered representatives are required to adhere to these products when implementing securities transactions through United Planners. Commissions charged for these products may be higher or lower than commissions clients may be able to obtain if transactions were implemented through another broker/dealer. In addition, certain back-office, operational, technology and other administrative support that United Planners provides FPG's IARs also benefit FPG.

Additionally, product sponsors such as variable and investment companies and limited partnerships which are recommended to clients may provide support to FPG. Such support includes research, educational information, and monetary support for due diligence trips and client events.

Item 13. Review of Accounts

Investment Supervisory Services

While the underlying securities within Investment Supervisory Services accounts are continuously monitored, these accounts are reviewed at least quarterly by Dana Anderson of FPG. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. Changes in variables such as market, political or economic circumstances, or changes in a client's individual financial objectives or circumstances may trigger more frequent reviews.

In addition to the monthly statements and confirmations of transactions that Investment Supervisory Services clients receive from their broker dealer, FPG will provide quarterly reports summarizing account performance, balances and holdings.

Financial Planning Services

These client accounts will be reviewed as contracted for at the inception of the advisory relationship.

Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for at the inception of the advisory relationship.

Item 14. Client Referrals and Other Compensation

FPG IARs, in their individual capacities as registered representatives or insurance agents, may from time to time receive incentive awards for the sale of securities and insurance products. The receipt of these awards may affect their judgment in recommending securities and insurance products to clients.

Item 15. Custody

Except for the direct billing of account fees (as authorized by clients in writing), FPG does not have any arrangements by which it accepts or undertakes custody of client funds or securities. Client funds and securities are always held with a qualified custodian, such as Schwab, who will provide the client with an account statement at least each calendar quarter. The account statement shows the amount of FPG's management fees that are deducted from the client's account during the period covered by the statement. Clients should review the account statements provided by their custodian carefully for accuracy.

Item 16. Investment Discretion

FPG will manage advisory accounts on a discretionary or non-discretionary basis. For discretionary clients, FPG requests that it be provided with written authority to determine which securities and the amounts of securities that are bought or sold.

Clients who wish to limit this discretionary authority must so indicate on their written discretionary authorization. Clients may change or amend these limitations at their election, but must do so in writing.

Advisory clients who elect not to grant such discretionary authority to FPG are advised that trades in their accounts may be executed subsequent to trades effected in discretionary accounts due to the time involved in obtaining consent. As a result, they may receive a higher or lower price per share of a given security than other clients.

Item 17. Voting Client Securities

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

Class Actions, Bankruptcies and other Legal Proceedings

FPG will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct FPG to transmit copies of class action notices to the client or a third party. Upon such direction, FPG will make commercially reasonable efforts to forward such notices in a timely manner.

Item 18. Financial Information

FPG does not require or solicit the prepayment of any fees more than six months in advance of services rendered. Additionally, FPG does not have any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.