



## **Solutions 4 Wealth, Ltd**

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March 2012

This brochure provides information about the qualifications and business practices of Solutions 4 Wealth, Ltd. If you have any questions about the contents of this brochure, please contact Mr. Hatcher at 817-416-1975 and/or [guy@apnow.com](mailto:guy@apnow.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 Solutions 4 Wealth, Ltd. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Material Changes**

This update reflects a request for change in regulatory registration from the SEC to the State of Texas.

The last annual update of this brochure was in March 2011.

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## ADVISORY BUSINESS

### Advisory Firm Description

While Solutions 4 Wealth, Ltd. (the "Firm") has been in business since September 2002, it has been a Registered Investment Advisor since 2007. Registration does not imply a certain level of skill or training. The principal owners are R. Guy Hatcher and Tamera Muse Hatcher.

### Types of Advisory Services

The Firm provides clients with a full array of services including fee-only investment management, financial planning and consulting.

The Firm's aim is to assist clients in defining their goals, providing various options to obtain their goals and assisting with the implementation of the selected plans to achieve those goals.

Initially, each client is interviewed at length to determine the client's needs and the best way for the Firm to meet them. Following is a list of the financial planning and consulting services and their descriptions provided by Solutions 4 Wealth, Ltd. to its clients:

- **Solutions 4 Wealth®:** A combination package consisting of five unique processes. The Life Evaluator Profile®, The Personal Financial Census®, The Investment Filter®, The Diversification Strategy® and From Generation to Generation® are each included in this value package. The Firm also provides personalized service with annual review meetings, quarterly phone conferences, annual financial magazine, annual personal tax planning, Medicare and Medicaid updates and a dedicated staff person.
- **The Wealth Review®:** A maintenance agreement whereby the Firm reviews the client's cash flow, net worth, investment choices and qualified distribution options on an annual basis. This review process monitors the performance of the financial plan for the previous twelve-month period and acts to ensure that the plan remains viable in the context of ever-changing personal desires and economic conditions.
- **The Life Evaluator Profile®:** A discovery process during which the client addresses the different elements that affect his life: emotional, physical, spiritual, financial and relational. The process helps the client to identify values, create vision as well as a sense of purpose and expectations for the present and future.
- **The Personal Financial Census®:** An analysis of the client's current financial plan. The Firm provides a current financial plan that includes cash flow, net worth statement, comparison of existing investments and qualified distribution options for the client.

- **The Investment Filter®:** Comparison of investment options in order to recommend to the client the most effective after tax return. The client's existing investments are compared with alternative options to achieve this result.
- **The Diversification Strategy®:** The plan will evaluate the level of diversification within the client's present portfolio. Utilizing analytical tools, this process compares the client's current portfolio risk in relationship to current portfolio return. The plan also provides strategies to either maintain the current portfolio return decreasing risk through diversification or seek a higher level of portfolio return while still minimizing portfolio risk. This process takes advantage of the practice of "asset allocation."

### **Investment Advisory Services through Third-Party Managers**

When clients require assistance in designing, implementing, monitoring and maintaining an investment portfolio, clients execute an Investment Advisory Agreement granting the Firm a limited power of attorney, which allows the Firm to select appropriate third-party managers on the client's behalf.

The Third-Party Manager Programs are designed to allow clients access to professional portfolio management that is normally available only to larger institutional investors. The Firm has established relationships with outside custodians through which the Firm's clients may have access to institutional money managers. The Firm selects appropriate outside managers for each asset class in the client's portfolio and primarily uses funds and services provided by Dimensional Fund Advisors.

### **Investment Management for Variable Annuities**

Employees associated with the Firm may direct their clients to insurance companies which sell variable annuity products. In turn, the Firm may manage the underlying investment in the variable annuity and receive compensation directly from the client for this service. This compensation is based on the Investment Advisory Services fee schedule as shown below.

### **Tailored Advisory Services**

The client will inform the Firm of any corporate affiliations or other matters that may cause securities purchased or sold in the account to be deemed "restricted" securities under applicable federal or state securities law. Clients may restrict the Firm from purchasing or selling particular securities or sectors by notifying the Firm in writing.

### **Client Assets Under Management**

At 12/31/2011, Solutions 4 Wealth had approximately \$41 million of discretionary assets under management and \$6 million of non-discretionary assets.

## FEES AND COMPENSATION

Fees for financial planning may be included in the investment advisory fee as stated below, or may be charged in addition to investment management fees. If charged in addition to the investment management fees, a mutually agreed-upon fixed fee is assessed. One half of the plan fee is due upon execution of the Investment Advisory Agreement, with the remainder due upon presentation of the completed plan material. It is possible that clients receiving the same service from the Firm will pay different fees.

The investment management fee schedule for the Firm follows:

<u>Portion of Investment Portfolio</u>	<u>Annual Rate</u>
Up to \$500,000	1.30%
\$500,000 to \$750,000	1.20%
\$750,000 to \$1,000,000	1.10%
\$1,000,000 to \$2,000,000	1.00%
\$2,000,000 or more	0.95%

Firm investment management fees are billed quarterly in advance at the rate of one fourth of the annual fee shown above and are typically deducted from clients' accounts. Fees for a quarter are calculated based on the portfolio valuation as determined by the account custodian at the close of market on the last business day of the prior quarter. If a client opens an account during a quarter, fees will be calculated based on the value of the account when it is funded and will be charged when the account is fully funded based on the number of days remaining in the quarter.

Consulting fees are charged a mutually agreed-upon fixed fee. One half of the fee is due upon execution of the Investment Advisory Agreement, with the remainder due at the end of the engagement.

### Other Fees

Any transaction, wire transfer or margin interest fees will be charged by the custodian directly to the account. When the Firm recommends a mutual fund for a client's account, three separate fees may be charged to the client, either directly or indirectly. The first fee is the Firm's investment management fee where the fund is included in the asset base for the quarterly fee calculation. The second is the set of internal fees charged by the investment company for the fund's investment management, marketing, administration and marketing assistance. These internal expenses are disclosed in each fund's prospectus which is provided to each client by the custodian. (This set of fees also applies to any money market fund purchased in the client's account.) The third fee may be a transaction fee which is assessed by the custodian for its service of providing access to a universe of mutual fund families through one account. To avoid such fees a client would be required to open a separate account with each individual mutual fund company instead of using the custodian recommended by the Firm, which would also negatively affect the Firm's ability to deliver its services efficiently. Not all mutual fund trades enacted by the Firm incur this transaction fee. When recommending mutual funds for client portfolios, the Firm only recommends no-load funds.

## **Termination**

The Investment Advisory Agreement allows for either party to terminate the agreement immediately upon receipt of written notice. The client may terminate the Agreement without penalty within five (5) business days after entering the Agreement. Otherwise, if the Agreement is terminated during a quarter, the client will pay the Firm for fees due on a prorated basis, or the Firm will repay the client any prepaid fees which have not yet been earned based on the number of days remaining in the quarter.

## **PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

The Firm does not charge performance-based fees or engage in side-by-side management.

## **TYPES OF CLIENTS**

The Firm provides investment supervisory services and manages investment advisory accounts for:

- Individuals
- High net worth individuals
- Pension and profit sharing plans
- Trusts, estates
- Partnerships

The Firm does not require a minimum account size for investment management.

## **METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

The Firm begins with solid academic research. The Firm's philosophy is grounded in the belief that markets are efficient and that managers cannot consistently pick stocks that will outperform their comparable market. The Firm mirrors the market with a diversified portfolio of 12,000 plus companies and a broad coverage of asset classes. By utilizing more than ten investment portfolios, the Firm is able to match a client to a desired investment risk and successfully capture what the markets have to offer. These time-tested strategies allow the Firm to provide portfolios that minimize tax impacts, expenses and risks, while attempting to maximize return. The portfolio strategies and consequent asset allocations are structured to meet clients' investment objectives, risk tolerance and investing time horizon. Risks for each strategy vary according to the individual security types and investments selected and the frequency of trading. Generally, the Firm adheres to a "buy and hold" philosophy overall, minimizing transaction costs and account turnover. This philosophy will mean accounts are likely to miss short-term market swings, whether up or down.

The Firm does not guarantee the future performance of the account or any specific level of performance, the success of any investment decision or strategy that the Firm may

use, or the success of the Firm's overall management of the account. The client understands that investment decisions made for the client's account by the Firm are subject to various market, currency, economic, political and business risks, and that those investment decisions will not always be profitable. Clients are reminded that investing in any security entails risk of loss which they should be willing to bear.

#### **DISCIPLINARY INFORMATION**

There have been no disciplinary actions against the Firm or Mr. Hatcher.

#### **OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

Advanced Planning, Inc., a related entity, is an insurance agency, with whom Mr. Hatcher, Mr. Farmer and Ms. Hatcher are agents. Advanced Planning, Inc. also provides estate planning services to its clients, not including investment advice. Mr. and Ms. Hatcher own this entity jointly. The Firm, or individuals associated with it, may develop financial plans for clients recommending insurance products which are available from Advanced Planning, Inc. and elsewhere. These same individuals may then provide the recommended insurance products to the client through Advanced Planning, Inc. The Firm receives a commission from that sale. This creates a potential conflict of interest with the client, as the Firm may be recommending insurance products from which the Firm will benefit. Clients are free to purchase insurance products elsewhere.

Mr. and Ms. Hatcher jointly own Sable, LLC, which is the general partner of Solutions 4 Wealth, Ltd.

Mr. Hatcher owns Grizzly, LLC which owns an office building that is leased to other businesses. Grizzly, LLC is a member of Prestige Plaza Partners, GP ("Prestige"). Some advisory clients are also partners in Prestige.

Additionally, Mr. Hatcher owns The Company Coach, LLC. This is a non-investment related business.

#### **CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

##### **Code of Ethics**

The Firm has adopted a Code of Ethics which describes the general standards of conduct that the Firm expects of all Firm personnel (collectively referred to as "employees") and focuses on three specific areas where employee conduct has the potential to adversely affect the client:

- Misuse of nonpublic information
- Personal securities trading
- Outside business activities



Failure to uphold the Code of Ethics may result in disciplinary sanctions, including termination with the Firm. Any client or prospective client may request a copy of the Firm's Code of Ethics which will be provided at no cost.

The following basic principles guide all aspects of the Firm's business and represent the minimum requirements to which the Firm expects employees to adhere:

- Clients' interests come before employees' personal interests and before the Firm's interests.
- The Firm must fully disclose all material facts about conflicts of interest of which it is aware between itself and clients as well as between Firm employees and clients.
- Employees must operate on the Firm's behalf and on their own behalf consistently with the Firm's disclosures and to manage the impacts of those conflicts.
- The Firm and its employees must not take inappropriate advantage of their positions of trust with or responsibility to clients.
- The Firm and its employees must always comply with all applicable securities laws.

#### *Misuse of Nonpublic Information*

The Code of Ethics contains a policy against the use of nonpublic information in conducting business for the Firm. Employees may not convey nonpublic information nor depend upon it in placing personal or clients' securities trades.

#### *Personal Securities Trading*

The Firm or individuals associated with the Firm may buy, sell or hold in their personal accounts the same securities that the Firm recommends to its clients. (The Firm primarily recommends mutual funds to its clients.) Such trades typically occur the day after trades placed on behalf of clients. Employees of the Firm may not participate in block trades with clients. For periodic review and monitoring of employee trades, employees must maintain their personal brokerage accounts at the custodian whom the Firm recommends clients use.

The Firm's Code of Ethics allows the purchase of IPOs or private placements only with prior permission from Mr. Hatcher, the Firm's Chief Compliance Officer. Participation in private issues with clients is permitted.

Employees are required to submit reports of personal securities trades on a quarterly basis, and securities holdings annually. These are reviewed by the Chief Compliance Officer to ensure compliance with the Firm's policies.

### *Outside Business Activities*

Employees are required to report any outside business activities generating revenue. If any are deemed to be in conflict with clients, such conflicts will be fully disclosed or the employee will be directed to cease this activity.

## **BROKERAGE PRACTICES**

### **Selection of Brokers**

The Firm participates in the Schwab Institutional (SI) services program offered to independent investment advisors by Charles Schwab & Company, Inc. ("Schwab"), a FINRA-registered broker-dealer. Clients in need of brokerage and custodial services will generally have Schwab recommended to them due to Schwab's:

- Discounted commission structure
- Arrangements with multiple mutual fund families to trade through Schwab
- Financial stability
- Provision of account information online to all clients
- Client service to the Firm and its clients
- Ease of reporting to the Firm and its clients

As part of the SI program, the Firm receives benefits that it would not receive if it did not offer investment advice.

### **Research and Other Soft-Dollar Benefits**

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

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

Schwab also makes available to the Firm other products and services that benefit the Firm but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of the Firm's accounts.

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

- Provide access to client account data (such as trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide research, pricing and other market data
- Facilitate payment of the Firm's fees from its clients' accounts
- Assist with back-office functions, recordkeeping and client reporting

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

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

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

### **Brokerage for Client Referrals**

The Firm does not receive referrals from a broker/dealer or third party providing service to the Firm.

### **Directed Brokerage**

Some clients may choose to execute trades through broker/dealers with whom they have an existing relationship. In this instance, the Firm is less able to meet its fiduciary duty to obtain best execution for transactions executed for clients. These clients are also unable to participate in aggregated trade orders.

## **Order Aggregation**

The Firm will generally aggregate brokerage orders for clients and allocate the securities purchased or sold among the participating accounts, with each account receiving the same terms. The proportion in which participating accounts will share transactions will be determined by the portfolio manager(s) on the basis of investment objectives, cash availability, expected cash and liquidity needs, and other relevant factors. The overarching principle for that allocation is that no client is intentionally favored over another client that is similarly situated. Schwab does not provide a commission break to aggregated trades.

## **REVIEW OF ACCOUNTS**

Mr. Hatcher, President, and Mr. Farmer, Financial Services Manager, conduct reviews of managed accounts as a matter of course at least quarterly. Such reviews entail looking at holdings of each portfolio in light of each client's investment objective. All clients are encouraged to meet with the Firm at least annually. Additional reviews may be triggered by events such as a client meeting, change in a clients' risk tolerance, financial position or investment objective, change in a company or fund's management, unusual market or economic circumstances or other unforeseen events.

The Firm may provide clients of the Investment Advisory Service with summary statements on a year-to-date basis upon termination.

## **CLIENT REFERRALS AND OTHER COMPENSATION**

The Firm does not pay outside individuals or entities for referring clients.

## **CUSTODY**

The payment of the Firm's fee directly from the client's account is deemed a form of custody by the Securities and Exchange Commission, although all investments and funds are held by an outside qualified custodian. The Firm may direct the movement of funds from one account in the client's name to another account in the client's name, but has no access to funds or securities except for this deduction of management fees.

Clients are required to open accounts with a qualified custodian that provides at least quarterly statements showing all transactions occurring in the account during the period, listing all assets valued as of period-end. Confirmations and statements are both sent by the custodian directly to each client. The Firm recommends Charles Schwab as a custodian for clients' accounts, with each client signing a separate agreement with the custodian. When clients receive their account statements from the qualified custodian, they should carefully review those statements.

## **INVESTMENT DISCRETION**

The client requires the Firm to receive permission before purchasing a new security or to sell an entire position in his or her portfolio prior to placing the trade order. Rebalancing

within the portfolio will not require prior permission from the client. Therefore, the client grants the Firm limited trading authority (through a Limited Power of Attorney).

#### **VOTING CLIENT SECURITIES**

The Firm does not vote proxies for securities held in clients' accounts. Clients receive proxy material directly from their account custodian by either email or U.S. mail. Clients may address questions concerning a proxy matter to Firm personnel.

#### **FINANCIAL INFORMATION**

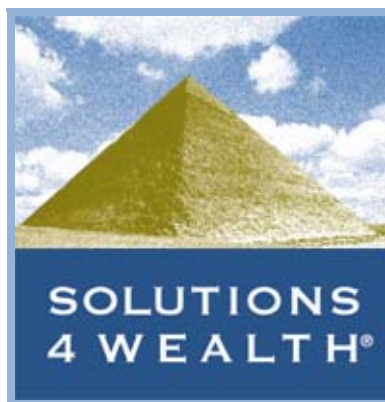
There is no financial condition that is reasonably likely to impair the Firm's ability to meet its contractual commitments to its clients.

#### **REQUIREMENTS FOR STATE-REGISTERED ADVISERS**

Please see the brochure supplement for information regarding the Firm's owner, R. Guy Hatcher.

Neither the Firm nor any of its officers or principals has been involved in an award in an arbitration claim alleging damages, or an award of being found liable in a civil, self-regulatory organization, or administrative proceeding.

Neither the Firm nor any of its officers or principals has a relationship or arrangement with an issuer of securities



**R. Guy Hatcher, CFP<sup>®</sup>**

**Solutions 4 Wealth, Ltd.**

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**March 2012**

This brochure supplement provides information about R. Guy Hatcher that supplements the Solutions 4 Wealth, Ltd. brochure. You should have received a copy of that brochure. Please contact R. Guy Hatcher at 817-416-1975 if you did not receive Solutions 4 Wealth Ltd.'s brochure or if you have any questions about the contents of this supplement.

Additional information about R. Guy Hatcher is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

### **R. Guy Hatcher, CFP<sup>®</sup>, born 1959**

Guy Hatcher, a Certified Financial Planner<sup>®</sup>, is the founder and president of Advanced Planning, Inc. ("API"). Guy established the firm in 1993 to fulfill his desire to offer clients a unique life and financial planning experience. His areas of expertise include wealth management, estate planning and business coaching.

With help from the team at API, Guy is able to focus his unique talents on what's important – helping his clients enjoy success on their terms.

Guy has been in the financial planning business since 1987. He received his certification from the respected College of Financial Planning in Greenwood Village, Colorado.

Dynamic, compassionate and intuitive, Guy has a unique gift for understanding people and their needs, as well as a rare ability to render complex financial issues in straightforward terms. Guy has helped thousands of families and businesses build wealth and enjoy ongoing success.

The Company Coach<sup>®</sup>, Solutions 4 Wealth<sup>®</sup>, and the team concept are several of the creative methods Guy has developed to ensure that the highest level of service and value is provided to his clients. Guy is also a nationally recognized speaker at industry conferences and has trained successful individuals and business owners in hundreds of educational workshops and seminars.

#### *Business Background:*

Solutions 4 Wealth, Ltd., Chief Compliance Officer, April 2007 – present

Advanced Planning, Inc., President, March 1993 – present

Investment Advisor Representative 1997 to 2007

Linsco/Private Ledger, Registered Representative January 2006 – March 2007

#### *Education:*

Howard Payne University, 1978

Certified Financial Planner<sup>®</sup>, 1994

#### Certified Financial Planner<sup>®</sup> Certification

The CFP<sup>®</sup> certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP<sup>®</sup> 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.

To attain the right to use the CFP<sup>®</sup> 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.

- Examination – Pass the comprehensive CFP® Certification Examination, a 10-hour exam.
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year).
- 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.
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*.

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.

#### **DISCIPLINARY INFORMATION**

Mr. Hatcher has no disciplinary or legal events to disclose.

#### **OTHER BUSINESS ACTIVITIES**

Mr. Hatcher is an insurance agent with Advanced Planning, Inc., a related entity, that recommends insurance products to clients. Approximately 30% of Mr. Hatcher's time is spent with API. Mr. Hatcher may develop financial plans for clients where insurance products are recommended from Advanced Planning, Inc. He may then provide these recommended insurance products to the client. The Firm receives a commission from that sale, which creates a potential conflict of interest with the client. Clients are free to purchase insurance products elsewhere.

Mr. Hatcher owns and runs a few additional non-investment related businesses, Grizzly, LLC and Prestige Plaza Partners, GP, which take approximately 50% of his time. This includes providing coaching service to small business owners through The Company Coach, LLC.

#### **ADDITIONAL COMPENSATION**

Mr. Hatcher receives no compensation beyond that disclosed above under Other Business Activities.

#### **SUPERVISION**

Mr. Hatcher is the senior person at Solutions 4 Wealth, Ltd., so does not have a supervisor.

#### **REQUIREMENTS FOR STATE-REGISTERED ADVISERS**

Mr. Hatcher has not been found liable in an arbitration claim, nor has he been found liable in a civil, self-regulatory organization, or administrative proceeding.





**Edward Blake Farmer**

**Solutions 4 Wealth, Ltd.**

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March 2012

This brochure supplement provides information about Edward Blake Farmer that supplements the Solutions 4 Wealth, Ltd. brochure. You should have received a copy of that brochure. Please contact R. Guy Hatcher at 817-416-1975 if you did not receive Solutions 4 Wealth, Ltd.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Edward Blake Farmer is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

**Edward Blake Farmer, born 1954**

*Business Background:*

Solutions4Wealth, Ltd., Financial Services Manager and Investment Advisor Representative,  
March 2007 – present  
Advanced Planning, Inc., Client Services Manager, September 1997 – present  
Linsco/Private Ledger, Registered Representative, January 2006 – March 2007

*Education:*

Tarrant County College, 1973 – 1975  
University of Texas, Arlington, General Studies, 1976  
Certifications: Series 65

## DISCIPLINARY INFORMATION

Mr. Farmer has no disciplinary or legal events to disclose.

## OTHER BUSINESS ACTIVITIES

Mr. Farmer is an insurance agent with Advanced Planning, Inc., a related entity, that recommends insurance products to clients. Mr. Farmer may develop financial plans for clients where insurance products are recommended from Advanced Planning, Inc. He may then provide these recommended insurance products to the client. The Firm receives a commission from that sale. This creates a potential conflict of interest with the client. Clients are free to purchase insurance products elsewhere.

## ADDITIONAL COMPENSATION

Mr. Farmer receives no compensation beyond that disclosed above under Other Business Activities.

## SUPERVISION

Mr. Farmer's work is supervised by R. Guy Hatcher, Chief Compliance Officer, who meets at least weekly with him. Mr. Hatcher can be reached at (817) 416-1975.

## REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. Farmer has not been found liable in an arbitration claim, nor has he been found liable in a civil, self-regulatory organization, or administrative proceeding.