

# **DISCLOSURE BROCHURE**

## **Cornerstone Financial Planning LLC**

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This brochure provides information about the qualifications and business practices of Cornerstone Financial Planning LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 716-828-8390. 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 Cornerstone Financial Planning LLC (CRD #174845) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**JANUARY 5, 2016**

## **Item 2: Material Changes**

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### **Annual Update**

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

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

Since the last filing on November 16, 2015, the following has been updated:

- The employment sections in the Supervised Person Brochures have been updated for aesthetic purposes.
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### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

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## Item 4: Advisory Business

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### **Firm Description**

Cornerstone Financial Planning LLC (“Cornerstone”) was founded in 2011 and became registered as an investment advisor in 2015. Nicholas J. Efthemis is 50% owner and Chief Compliance Officer; Charles E. Hanny is 50% owner.

Cornerstone is a fee based financial planning and investment management firm. The firm does not sell annuities and insurance products, but the managing partners offers insurance products as a sole proprietor to clients.

Cornerstone does not act as a custodian of client assets.

An evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement, risk analysis or similar document. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, tax preparers, insurance agents, etc.) are engaged directly by the client on an as-needed basis and may charge fees of their own. For example, tax preparation and to the extent your estate plan needs to be updated, the tax preparer and/or attorney will bill the client separately. Conflicts of interest will be disclosed to the client in the event they should occur.

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### **Types of Advisory Services**

#### ASSET MANAGEMENT

Cornerstone offers discretionary direct asset management services to advisory clients. Cornerstone will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The client will authorize Cornerstone discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

#### SELECTION OF OTHER ADVISORS

When deemed appropriate for the client, Cornerstone may enter into relationships with Third Party Money Managers (“TPM”) to manage all or a portion of the client assets. In such circumstances, Advisor receives solicitor fees from the Third Party Manager. Advisor will be soliciting for, AssetMark Inc. and, SEI Investments Management Corporation. When utilizing AssetMark Inc., Cornerstone will have the discretion to hire and fire the individual managers in the Program. Advisor acts as the liaison between the client and the TPM in return for an ongoing portion of the advisory fees charged by the TPM. Advisor helps the client complete the necessary paperwork of the TPM, provides ongoing services to the client, will provide the TPM with any changes in client status as provided to Advisor by the client and review the quarterly statements provided by the TPM. Advisor will deliver the Form ADV Part 2, Privacy Notice and Solicitors Disclosure Statement of the TPM. Clients placed with TPMs will be billed in accordance with the TPM’s Fee Schedule which will be disclosed to the client prior to signing an agreement.

## FINANCIAL PLANNING AND CONSULTING

If financial planning services are applicable, the client will compensate Cornerstone on a negotiable fixed fee basis described in detail under “Fees and Compensation” section of this brochure. Services include but are not limited to a thorough review of all applicable topics including Estate Plan/Trusts, Investments, Taxes, Retirement Planning and Insurance. If conflict of interest exists between the interests of the investment advisor and the interests of the client, the client is under no obligation to act upon the investment advisor’s recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through Cornerstone. Financial plans and/or consultations will be completed and delivered inside of ninety (90) days.

Financial plans and/or consulting are based on your financial situation at the time Cornerstone presents the plan to you, and on the financial information you provided to Cornerstone. You must promptly notify Cornerstone if your financial situation, goals, objectives, or needs change.

You are under no obligation to act on our financial planning or consulting recommendations. Should you choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

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### **Client Tailored Services and Client Imposed Restrictions**

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

Agreements may not be assigned without written client consent.

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### **Wrap Fee Programs**

Cornerstone does not sponsor a wrap fee program, nor do they act as a portfolio manager for a wrap fee program.

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### **Client Assets under Management**

As of October 29, 2015, Cornerstone had approximately \$47,000,000 client assets under management on a discretionary basis.

## **Item 5: Fees and Compensation**

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### **Method of Compensation and Fee Schedule**

#### ASSET MANAGEMENT

Cornerstone offers discretionary direct asset management services to advisory clients. Cornerstone charges an investment advisory fee based on the client’s net worth as follows:

Assets Under Management	Maximum Annual Fee
Up to \$1,000,000	1.5%
\$1,000,001 - \$3,000,000	1.00%
Over \$3,000,000	Negotiable

The annual Fee may be negotiable. Accounts within the same household may be combined for a reduced fee. Fees are billed quarterly in advance based on the amount of assets managed as of the last business day of the previous quarter. Initial fees for partial quarters are pro-rated. Quarterly advisory fees deducted from the clients' account by the custodian will be reflected in a provided fee invoice as fees are withdrawn. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement for a full refund. Clients may terminate advisory services with thirty (30) days written notice. For accounts closed mid-quarter, the client will be entitled to a pro rata refund for the days service was not provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees, and client will acknowledge, in writing, any agreement of increase in said fees.

#### **SOLICITOR FEES**

Cornerstone has entered into Solicitor Agreements with AssetMark Inc. (AssetMark) and SEI Investments Management Corporation (SEI). AssetMark and SEI are Registered Investment Advisors registered with the Securities and Exchange Commission and provide investment portfolios and supervisory services. When acting as a solicitor the third party money manager will deduct fees from the client account and will pay Cornerstone their portion of the fee.

#### **AssetMark Inc.**

AssetMark provides a platform which is made up of three (3) separate and distinctive parts, but charged to the client as one fee. The three parts are the AssetMark Management Fees, the Custodial Fees, and the Financial Professional Fee. In addition, Cornerstone may charge the client an initial consulting fee.

For each account opened for a client with AssetMark, Cornerstone will receive compensation including initial consulting fees and/or financial advisor fees.

#### ***AssetMark Platform Fees***

The AssetMark platform management fee will be charged as a percentage of assets under management ranging from 0 to 1.50% depending upon the investment program chosen. The fee is calculated and debited quarterly.

#### ***Financial Advisor Fees***

AssetMark shall pay Cornerstone an ongoing, annual-rate compensation fee. The fee amount is determined and disclosed to the client by Cornerstone before implementation and will range from 0 to 1.5% of the client assets under management. The solicitor fee is calculated and debited quarterly by AssetMark and paid to directly to Cornerstone.

#### **SEI Investments Management Corporation (SEI)**

Cornerstone also has an arrangement with SEI, a SEC Registered Investment Advisor. For clients utilizing SEI's management services, SEI will charge between .0% and 1.30%. These fees are an annual fee based on assets under management. In addition to the fees charged by SEI, Cornerstone will charge the following:

Assets Under Management	Maximum Annual Fee
Up to \$1,000,000	1.5%
\$1,000,001 - \$3,000,000	1.00%
Over \$3,000,000	Negotiable



Fees are paid quarterly in arrears, based on the account value at the end of the current quarter. The relationship between Advisor and the Third Party Money Manager will be disclosed to the client in writing prior to commencement of the services. Advisor does not charge additional management fees for Third Party managed account services. Client's signature is required to confirm consent for services within Third Party Investment Agreement. Client will initial Advisor's Investment Advisory Agreement to acknowledge receipt of Third Party fee Schedule and required documents including Form ADV Part 2 disclosures.

#### **FINANCIAL PLANNING and CONSULTING**

Cornerstone charges a negotiable fixed fee ranging between \$1,000 and \$7,500 for financial planning. Prior to the planning process the client will be provided an estimated plan fee.

The services include, but are not limited to, a thorough review of all applicable topics including Estate Plan/Trusts, Investments, Taxes, Retirement Planning and Insurance. Client will pay the estimated fee at the signing of the agreement. Services are completed and delivered inside of ninety (90) days. Client may cancel within five (5) business days of signing Agreement for a full refund. If the client cancels after five (5) business days, a pro-rata refund will be issued to the client based on the work completed.

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#### **Client Payment of Fees**

Investment management fees are billed quarterly in advance, meaning we bill you when the three-month period has started. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed in advance.

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#### **Additional Client Fees Charged**

Custodians may charge transaction fees and brokerage fees on purchases or sales of certain mutual funds, equities, stocks and exchange-traded funds. These charges may include Mutual Fund transactions fees, brokerage fees, postage and handling and miscellaneous fees (fee levied to recover costs associated with fees assessed by self regulatory organizations). These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Cornerstone, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

For more details on the brokerage practices, see Item 12 of this brochure.

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#### **Prepayment of Client Fees**

Investment management fees are billed quarterly in advance.

Financial planning fees will be paid at the signing of the agreement.

If the client cancels after five (5) business days, a refund will be issued based on the work completed.

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**External Compensation for the Sale of Securities to Clients**

Mr. Efthemis receives external compensation for the sale of securities to clients as a registered representative of American Portfolios, a broker-dealer. Approximately 10% of his time is spent in this practice and less than 50% of his total revenue is generated as a registered representative. From time to time, he will offer clients products from these activities.

This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. As a registered representative, Mr. Efthemis does not charge advisory fees for the services offered through American Portfolios. This conflict is mitigated by the fact that Mr. Efthemis has a fiduciary responsibility to place the best interest of the client first and clients are not required to purchase any products or services. Clients have the option to purchase these products through another registered representative of their choosing.

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**Item 6: Performance-Based Fees and Side-by-Side Management**

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**Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

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

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**Item 7: Types of Clients**

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**Description**

Cornerstone generally provides investment advice to individuals, high net worth individuals, trusts, estates, charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

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**Account Minimums**

Cornerstone does not require a minimum to open an account.

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

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**Methods of Analysis**

Security analysis methods may include fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market.

When creating a financial plan, Cornerstone utilizes fundamental analysis to provide review of insurance policies for economic value and income replacement. The main sources of information include Morningstar, client documents such as tax returns and insurance policies.

In developing a retirement plan for a client, Cornerstone's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the client's specific situation.

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### **Investment Strategy**

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

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

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### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor.

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

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

- *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

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

### **Administrative Enforcement Proceedings**

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

### **Self Regulatory Organization Enforcement Proceedings**

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

## **Item 10: Other Financial Industry Activities and Affiliations**

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### **Broker-Dealer or Representative Registration**

Members Nicholas J. Efthemis and Charles E. Hanny are registered representatives of American Portfolios, a broker-dealer.

### **Futures or Commodity Registration**

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

### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Member Nicholas J. Efthemis is also a licensed insurance agent as a sole proprietor. Approximately 5% of Mr. Efthemis' time is spent in these practices. From time to time, he will offer clients products and/or services from these activities.

Mr. Efthemis is also a registered representative and investment advisor representative of American Portfolios. Approximately 10% of his time is spent in these practices. From time to time, he will offer clients products and/or services from these activities.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by the fact that Mr. Efthemis has a fiduciary responsibility to place the best interest of the client first and clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another financial professional of their choosing.

Cornerstone requires all Investment Advisor Representatives and Management to disclose material relationships and conflicts of interest to the firm's Chief Compliance Officer.

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**Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

Cornerstone may at times utilize the services of Third Party Money Managers to manage client accounts. In such circumstances, Cornerstone will share in the Third Party asset management fee. This situation does not create a conflict of interest since Cornerstone will receive the same compensation regardless of the Manager chosen. When referring clients to a third party money manager, the client's best interest will be the main determining factor of Cornerstone. These fees do not include brokerage fees that may be assessed by the custodial broker dealer. Fees for these services will be based on a percentage of assets under management not to exceed any limit imposed by any regulatory agency. The final fee schedule will be attached to Exhibit D in Cornerstone's Investment Advisory Agreement.

Before entering into a Solicitor Agreement with any third party money manager, Cornerstone will review the firm's Form ADV Part 2 for any disclosable events as well as inquire into open issues which may impair a money manager from providing services. Prior to referring any clients to third party advisors, Cornerstone will make sure that they are properly registered or notice filed.

This relationship will be disclosed to the client in each contract between Cornerstone and Third Party Money Manager. Cornerstone does not charge additional management fees for Third Party managed account services. Client's signature is required to confirm consent for services within Third Party Investment Agreement. Client will initial Cornerstone's Investment Advisory Agreement to acknowledge receipt of Third Party fee Schedule and required documents including Form ADV Part 2 disclosures.

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

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**Code of Ethics Description**

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

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

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

Cornerstone's Code is based on the guiding principle that the interests of the client are our top priority. Cornerstone's officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the

complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client's interests over the interests of either employees or the company.

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

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

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

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

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

Cornerstone and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Cornerstone with copies of their brokerage statements.

The Chief Compliance Officer of Cornerstone is Nicholas J. Efthemis. He reviews all employee trades each month. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

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

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

The Chief Compliance Officer of Cornerstone is Nicholas J. Efthemis. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

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**Item 12: Brokerage Practices**

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**Factors Used to Select Broker-Dealers for Client Transactions**

Cornerstone will recommend the use of a particular broker to custody client assets. Cornerstone receives a benefit because it does not have to pay for the research, services, or product and it may have an incentive to recommend a broker-dealer based on its interest rather than the clients. Cornerstone will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Cornerstone relies on its broker to provide its execution services at the

best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Cornerstone.

- *Directed Brokerage*  
Cornerstone does not allow directed brokerage.
- *Best Execution*  
Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.
- *Soft Dollar Arrangements*  
The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by Cornerstone from or through a broker-dealer in exchange for directing client transactions to the broker-dealer. As permitted by Section 28(e) of the Securities Exchange Act of 1934, Cornerstone receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of Cornerstone. These benefits include both proprietary research from the broker and other research written by third parties.

A conflict of interest exists when Cornerstone receives soft dollars. This conflict is mitigated by the fact that Cornerstone has a fiduciary responsibility to act in the best interest of its clients and the services received are beneficial to all clients.

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### **Aggregating Securities Transactions for Client Accounts**

Cornerstone is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of Cornerstone. All clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis.

## **Item 13: Review of Accounts**

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### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Account reviews are performed quarterly by the Chief Compliance Officer of Cornerstone. Account reviews are performed more frequently when market conditions dictate. Financial Plans are considered complete when recommendations are delivered to the client and a review is done only upon request of client.

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

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

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**Content of Client Provided Reports and Frequency**

Clients receive account statements no less than quarterly for managed accounts. Account statements are issued by the Advisor's custodian. Client receives confirmations of each transaction in account from Custodian

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**Item 14: Client Referrals and Other Compensation**

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**Economic benefits provided to the Advisory Firm from External Sources and Conflicts of Interest**

Cornerstone receives a portion of the annual management fees collected by the Third Party Money Managers to whom Cornerstone refers clients.

This situation does not create a conflict of interest because Cornerstone and/or its Investment Advisor Representative will receive the same compensation regardless of the manager chosen.

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**Advisory Firm Payments for Client Referrals**

Cornerstone does not compensate for client referrals.

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**Item 15: Custody**

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**Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the performance report statements prepared by Cornerstone.

Cornerstone is deemed to have constructive custody solely because advisory fees are directly deducted from clients' accounts by the custodian on behalf of Cornerstone.

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**Item 16: Investment Discretion**

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**Discretionary Authority for Trading**

Cornerstone accepts discretionary authority to manage securities accounts on behalf of clients. Cornerstone has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. By signing a limited power of attorney, the client will authorize Cornerstone discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement. However, Cornerstone consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. Cornerstone does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.



## **Item 17: Voting Client Securities**

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### **Proxy Votes**

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

When assistance on voting proxies is requested, Cornerstone will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

## **Item 18: Financial Information**

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### **Balance Sheet**

A balance sheet is not required to be provided because Cornerstone does not serve as a custodian for client funds or securities and Cornerstone does not require prepayment of fees of more than \$500 per client and six months or more in advance.

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

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

### **Bankruptcy Petitions during the Past Ten Years**

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

ITEM 1 COVER LETTER

# **SUPERVISED PERSON BROCHURE**

FORM ADV PART 2B

Nicholas John Efthemis CFP®

## **Cornerstone Financial Planning LLC**

**Office Address:**

5500 Main Street  
Suite 260  
Williamsville, NY 14221

Tel: 716-828-8390

Fax: 716-828-8395

nefthemis@americanportfolios.com

This brochure supplement provides information about Nicholas J. Efthemis and supplements the Cornerstone Financial Planning LLC's brochure. You should have received a copy of that brochure. Please contact Nicholas J. Efthemis if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Nicholas J. Efthemis (CRD #2821400) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**JANUARY 5, 2016**

# Brochure Supplement (Part 2B of Form ADV)

## Supervised Person Brochure

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### Principal Executive Officer

**Nicholas John Efthemis CFP®**

- Year of birth: 1972
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### Professional Certifications

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

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

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

- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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### **Educational Background and Business Experience**

#### **Educational Background:**

- State University College at Buffalo; Suma Cum Laude, Bachelors of Science; 1995

#### **Business Experience:**

- Cornerstone Financial Planning LLC; Co-Owner/Investment Advisor Representative; 02/2015 - Present
- Sole Proprietor; Licensed Insurance Agent; 01/1997-Present
- American Portfolio; Registered Representative/Investment Advisor Representative; 02/2010-Present
- Cornerstone Financial Planning LLC; Co-Owner; 8/2011- 02/2015
- Ameriprise; Registered Representative/Investment Advisor Representative; 01/1997-02/2010

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### **Disciplinary Information**

None to report

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### **Other Business Activities**

Member Nicholas J. Efthemis is also a licensed insurance agent as a sole proprietor. Approximately 5% of Mr. Efthemis' time is spent in these practices. From time to time, he will offer clients products and/or services from these activities.

Mr. Efthemis is also a registered representative and investment advisor representative of American Portfolios. Approximately 10% of his time is spent in these practices. From time to time, he will offer clients products and/or services from these activities.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by the fact that Mr. Efthemis has a fiduciary responsibility to place the best interest of the client first and clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another financial professional of their choosing.

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### **Additional Compensation**

Mr. Efthemis receives additional compensation in his capacity as an insurance agent and registered representative. He does not receive any performance based fees.

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### **Supervision**

Since Mr. Efthemis is the Chief Compliance Officer of Cornerstone Financial Planning LLC, he is solely responsible for all supervision, formulation and monitoring of

investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual.

ITEM 1 COVER LETTER

# **SUPERVISED PERSON BROCHURE**

FORM ADV PART 2B

Charles E. Hanny CFP<sup>®</sup>, CRPC<sup>®</sup>

## **Cornerstone Financial Planning LLC**

**Office Address:**

5500 Main Street  
Suite 260  
Williamsville, NY 14221

Tel: 716-828-8390

Fax: 716-828-8395

[channy@americanportfolios.com](mailto:channy@americanportfolios.com)

This brochure supplement provides information about Charles E. Hanny and supplements the Cornerstone Financial Planning LLC's brochure. You should have received a copy of that brochure. Please contact Charles E. Hanny if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Charles E. Hanny (CRD #2982732) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**DRAFT, 2015**

# Brochure Supplement (Part 2B of Form ADV)

## Supervised Person Brochure

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**Charles E. Hanny CFP®, CRPC®**

- Year of birth: 1975
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### Professional Certifications

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

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

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

- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Chartered Retirement Planning Counselor<sup>SM</sup> (CRPC®): Chartered Retirement Planning Counselor is a designation granted by the College for Financial Planning. CRPC® certification requirements:

- Successfully complete the program.
- Pass the final exam.
- Comply with the Code of Ethics.
- When you achieve your CRPC® designation, you must complete 16 hours of continuing education.
- Reaffirm to abide by the Standards of Professional Conduct.
- Pay a biennial renewal fee.

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## **Educational Background and Business Experience**

Educational Background:

- LeMoyne College; Suma Cum Laude, Bachelors of Science, Business Administration, concentration in finance and a minor in economics; 1997
- CFP Education Program; College for Financial Planning; 06/2008 – 07/2012
- CRPC Certification Program; College of Financial Planning; 07/2009 – 01/2010

Business Experience:

- Cornerstone Financial Planning LLC; Co-Owner/Investment Advisor Representative; 05/2015 – Present
- American Portfolios; Registered Representative; 02/2010 – Present
- Sole Proprietor; Insurance sales; 03/1998 – Present
- Cornerstone Financial Planning LLC; Co-Owner; 8/2011- 05/2015
- American Express Financial Advisors Inc.; Registered Representative; 11/1997 – 01/2010
- IDS Life Insurance Company; Insurance Agent; 11/1997 – 01/2010

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## **Disciplinary Information**

None to report

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## **Other Business Activities**

Charles Hanny is also a licensed insurance agent as a sole proprietor. Approximately 5% of Mr. Hanny's time is spent in these practices. From time to time, he will offer clients products and/or services from these activities.



Mr. Hanny is also a registered representative with American Portfolios. Approximately 15% of his time is spent in these practices. From time to time, he will offer clients products and/or services from these activities.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by the fact that Mr. Hanny has a fiduciary responsibility to place the best interest of the client first and clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another financial professional of their choosing.

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**Additional Compensation**

Mr. Hanny receives additional compensation in his capacity as an insurance agent and registered representative. He does not receive any performance based fees.

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**Supervision**

Charles Hanny is supervised by Nicholas Efthemis, Chief Compliance Officer. He reviews Charles' work through frequent office interactions as well as remote interactions.

Nicholas Efthemis' contact information:

Phone: 716-828-8390, or by email at: nefthemis@americanportfolios.com.