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This brochure provides information about the qualifications and business practices of Fiscal Fitness Clubs of America, LLC (“Fiscal Fitness Clubs of America”). If you have any questions about the contents of this brochure, please contact us at 720-507-8535 or info@fiscalfitnessclubs.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.

Fiscal Fitness Clubs of America is registered as an Investment Adviser with the State of Colorado and Florida. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Fiscal Fitness Clubs of America is available by searching for IARD #269996 on the SEC’s website at:

http://www.adviserinfo.sec.gov/IAPD/Content/Search/iapd_Search.aspx

2. Material Changes

Since our last ADV, we are excited that we have

- 1) Added that our coaching and financial planning services are now available in Spanish.
- 2) Added additional coaches to the FFC platform to help our clients
- 3) Added career counseling services to our offering
- 4) Now have additional contracted CFPs to serve as coaches that have been trained by us in different states to meet our client's needs.
- 5) New investment management custodian agreement with TD Ameritrade that expands our investment management capabilities.
- 6) Become registered with the SEC versus individual states

We're excited about these changes! We do encourage you to **read this document and ask us questions**. Learning what is covered in ADVs will help you select other advisors wisely in the future in addition to understanding our offerings.

A note from Carol & Cat:

As a CFP® Certificants, we have pledged to hold ourselves and our entire firm to the highest ethical and legal standards and to provide full disclosure to our clients prior to an engagement and when anything changes. We accept the fiduciary standard in ALL of our work. This document will give you material information about us and our practice and realistic expectations about what you will receive by working with us. We will outline any conflicts of interest that exist, along with sources of compensation. Please read this carefully and join us in a dialogue about the information included here. We want this to be a very positive experience for you. Understanding what to expect is an important part of that experience. Thank you for taking the time to read this. Don't hesitate to ask us questions about the meanings of any of these items. Some of these are designed to meet legal requirements and thus can be confusing. Asking is the only way for clarity. We look forward to working with you and answering any questions you have.

Carol S. Craigie, MA, ChFC®, CFP®
Managing Partner

Catalina Franco-Cicero, MS, CFP®
Director of Financial Wellness

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4. Advisory Business

Fiscal Fitness Clubs of America, LLC is and SEC registered Investment Advisor. We combine education and sound financial planning practices, with proven behavior change principles, to help people change cash flow management and gain the skills necessary for solving life’s financial issues. We are dedicated to helping clients improve their financial lives and develop workable solutions. We have been providing financial education and wellness since 2009 through use of educational seminars with employers and available to the public. In the past two years, we decided to expand our services to meet the needs of our clients to include individual financial planning, financial planning consultations, career readiness assessment and guidance, and investment management services. We specialize in working with clients who want to change their financial situation. Because we are a relatively new firm in relationship to investment management services and our primary focus is on financial education, our Discretionary Assets Under Management (AUM) are very minimal being \$262,139 at the beginning of the year.

The firm was started by Carol S. Craigie, MA, ChFC®, CFP®. Carol is the managing partner who supervises all financial plans. She is a 50% owner. You can read her history and background in her bio found in section 19.

Catalina M. Franco-Cicero, MS, CFP® is an expert in wellness coaching and is the other 50% owner. Read about Catalina's history and background in her bio found in section 19.

It is up to you as to how you'd like to engage with Fiscal Fitness Clubs of America. We can provide:

1. A low cost financial wellness program through a Fiscal Fitness Club membership (with an optional baseline financial plan)
2. Individual plans or on-going comprehensive financial planning services
3. Corporate executive transition planning
4. Financial planning consultations
5. Career readiness assessment and guidance
6. Discretionary investment advisory services on a fee-only basis to those individuals who have financial planning or club contracts.

OUR PHILOSOPHY:

Fiscal Fitness Clubs of America believes that the purpose of money is to first create financial security and then to accomplish your goals, while matching your values. We believe that joy in life can't be separated from money, and that reducing financial stress through the management of cash flow and assets can add more to joy to your life than owning "stuff", or buying experiences at the expense of your financial security. We also believe that "knowing" and "doing" are not the same. Our goal is to give you the knowledge and tools to manage your financial life, so you get what you really want from your labor and money. We are all about empowering you, not about you needing us. Our goal is that, at the end of our relationship, you will have confidence in your financial path and feel comfortable knowing what you need to do to manage your financial resources and advisors. That doesn't mean you might not prefer to delegate some or all of the tasks to us or someone else. Whether or not our relationship continues, our goal is that you will have confidence in your ability to make informed decisions.

There are two implications of this philosophy. The first is that you will be making a time commitment to this process, no matter which service you choose—gathering data, potentially tracking expenses, asking questions of your other advisors or employee benefits consultant, and reading reports are just some of the tasks you will be agreeing to do.

The second implication is that we separate our services into those that are related to knowledge and those related to habits. We use education and specific analysis of issues supervised by a CFP® Certificant to address those issues that require knowledge. Cash flow control is based on habits and knowledge and by itself is not enough. We use brief coaching calls, tweets, e-mails, groups, and texts to help clients with changing habits around cash flow control, paperwork management, and a number of other habits that contribute to a lifetime of fiscal fitness. Your coach will be a trained Fiscal Fitness Clubs of America coach.

OUR SERVICES:

Fiscal Fitness Club Membership

For companies wanting to provide Financial Wellness to employees, groups and associations wanting to help members take control of their finances or the do-it-yourselfers, people looking for low costs, and/or people who enjoy peer support in taking control of their finances, our Fiscal Fitness Clubs are a great choice. The clubs are offered both through employers and to individuals. People can create a club with friends or join a virtual club. The clubs lead people through the process to fiscal fitness.

To keep the costs down, education and support are provided through group classes, recorded training programs, and a monthly action focus. We provide step by step instructions with the forms and tools, along with support to take control of your finances, so do-it-yourselfers have a path to follow at their own pace. The program starts with a series of Getting Started classes (kind of like “spring training”) designed to jumpstart financial mastery through completing a series of assignments with the help of your coach. The introductory sessions cover:

- **Club Orientation:** Learn the details of our program and technology tools
- **Getting Ready to Change:** Identify and clarify your motivation and start developing goals.
- **Understanding Your Current Patterns:** Review of past expenditures, identification of what you want to change, roadblocks to success, and the impact of emotion on financial decisions are covered.
- **Diving into the Numbers:** Creation of your net worth, a detailed budget and completion of financial planning software that identifies what is needed to achieve your goals gets you ready to create a new, specific spending plan that is a clear, concrete, and measurable path to success.
- **Creating a New Master Plan:** This session brings together all other components to make an easy-to-track master plan with individual achievable goals defined.
- **Celebrate your Success:** Every accomplishment deserves to be acknowledged! We recognize each other and get rewarded with access to really neat financial planning software!

After the session’s assignments are complete, you can choose to join a club’s short bi-weekly meetings. Each meeting starts with a “check-in” that tracks weekly progress on your target areas. A short group discussion on solutions and pitfalls to challenges being faced by participants follows. Having peer support for achieving your goals can be a key component to financial habit changes.

Once a month, an action class is dedicated to understanding and managing a specific component of a good financial plan and financial management. Practical, hands-on exercises teach an easy-to-follow system to manage financial resources and tasks. The calendar of action items includes:

<i>JAN:</i>	<i>Paperwork Management</i>
<i>FEB:</i>	<i>Annual Financial Summary: Net Worth & Cash Flow</i>
<i>MAR:</i>	<i>Taxes</i>
<i>APR:</i>	<i>Investment Review</i>
<i>MAY:</i>	<i>Life & Disability Risk Management</i>
<i>JUN:</i>	<i>Retirement Planning & Projections, including Long Term Care</i>
<i>JUL:</i>	<i>Other Goals (including debt management & education)</i>
<i>AUG:</i>	<i>Legal Documents & Estate Planning</i>
<i>SEP:</i>	<i>P & C Liability Insurance Review</i>
<i>OCT:</i>	<i>Employee Benefits Review & Medical Coverage</i>
<i>NOV:</i>	<i>Year – End Tax Strategies & Actions</i>
<i>DEC:</i>	<i>Setting New Year’s Resolutions for Fiscal Fitness</i>

Club Membership provides:

- Access to all the webinars, classes, and support materials available through our education and wellness program in a live webinar and in an online classroom.
- Email access to a coach for assistance in addressing life changing events, important financial decisions, and questions you may have.
- Ability to access a coach for conversation about issues through coach’s office hours.

Baseline Financial Planning for Club Members

People sometimes talk about getting a “financial plan”, but we think that this is a misnomer. The financial world is constantly changing. For example, tax laws, inflation, market returns, health insurance laws, and products change yearly. We see financial planning as a trend line comparing your progress and today’s environment against your goals. This trend line can help you see if you are on the right path and use it to make important decisions, BUT, it needs to be updated frequently to see if the path still works.

Some clients choose to have an initial financial plan completed in the beginning to help speed up the process of taking control of their money. Your personalized Financial Plan provides a baseline plan that will be used to identify initial problems and provide a trend line for comparison in future years. Your coach will meet with you individually to walk you through your plan and the implications of the findings. The clubs will teach you how to update it yourself, although you can still have us do it annually for \$300. To keep the costs low, you will be completing some questionnaires, entering data, uploading your documents for verification and reviewing all the input with your coach to make sure your information and assumptions are appropriate. For an additional fee, you can have an assistant coach enter the data. The baseline plan includes:

- One initial hour in a goals and orientation to software meeting.
- Review of your written summary of goals and issues, along with any financial concerns that you and your coach identified.
- A review meeting to explore the assumptions and make sure information entered is correct and in the right places.
- Access to the software that details your financial goals and what is needed to achieve those goals.
- A joint meeting to discuss the results and identify follow up issues and information you may need to be able to make informed decisions on potential solutions.
- Together, with your coach, you will create an implementation plan along with steps and target dates necessary to accomplish your plan.

The baseline plan is great for club members so they know what they need to do to achieve their goals, which can help in developing your new cash flow spending plan.

Individual Ongoing Comprehensive Planning Services

For many reasons, clients can choose to engage us for individualized comprehensive financial planning and/or ongoing support in place of the club model. People also choose this option because we take on more of the work of entering information, verifying its accuracy and talking with other advisors. It is more in-depth than the baseline plan. Individual clients still have access to all the classes and support activities and materials, if they choose.

Our individual ongoing comprehensive financial planning services involve working one on one with a financial planner over a set period of time. It usually starts with a detailed financial plan. After the presentation of the plan and clarification meetings, you have a choice as to whether you wish to continue the relationship by paying a monthly fee for us to monitor and coach you through implementing solutions along with providing focus on specific sections of your plan on a monthly basis. It also means you have access to a financial planner to discuss important choices you are facing to see the impact on your financial choices and lifestyle now and in the future. While many of the services are similar to our Fiscal Fitness Clubs, this program is more tailored to your time frame and needs and less work on your part, thus the higher cost. When you commit to this service, you will be taken through establishing goals and values around money. Your financial planner then summarizes your goals and potential issues in a written

document to review with you. It is especially helpful for people facing financial decisions such as planning on retiring within the next couple of years, deciding between funding options or concerns with specific investment choices and taxation.

Once the issues and goals are agreed upon, you will need to upload information into a secure folder to help complete the following areas of analysis: net worth, cash flow, debt use, tax strategies, credit score management, employee benefits selection, retirement planning, appropriate risk management use of insurance, investments, college planning, estate planning, and anything else we think is pertinent as we learn about your situation. The financial planner evaluates:

- What you need to do to achieve your goals
- Threats that could prevent you from accomplishing them (such as inadequate insurance, asset ownership, etc.)
- Potential strategies to improve the situation, along with alternatives

All of this information is provided in written or electronic financial planning report and reviewed in a joint meeting. A summary of the results of the meeting with your implementation decisions is provided to you. Upon delivery of this document, and answering any questions, within the next two weeks will conclude the delivery of the financial plan. At that point, you move to a monthly retainer, if you so choose. The plan must be delivered within six months of the initial fee. How quickly the plan is delivered will be based on you providing the required information for an accurate plan.

Sometimes follow up meetings are required either in person or by phone. The resulting plan, your financial situation, and goals are monitored throughout the year under the monthly fee. Follow-up phone calls and emails will be made to confirm that any agreed upon action steps have been carried out. On an annual basis, there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.

Corporate Executive Transition Planning

Corporate executives face many unique challenges when transitioning companies or retiring. Decisions on managing and addressing concentrations of corporate stock, how to utilize restricted stock on a tax efficient basis, and whether to utilize a Net Unrealized Appreciation (NUA) strategy in distributions from their qualified plans are just a few of the issues faced. Integrating gifting and estate taxes just add to the complexity. How these are addressed can result in major tax savings or consequences of thousands of dollars. Managing the employee benefits, deferred compensation options and investment choices in the year leading up to, the year of, and the year following transitions are critical. This program covers assisting the corporate executive through that process and includes:

- Organizing your financial information
- Reviewing legal documents
- Preparing net worth statements including contingent liabilities & debt restructure
- Analyzing cash flow needs in retirement or with the new position, review and strategize accomplishing financial goals
- Developing an investment strategy surrounding concentrations
- Assisting with selection of employee benefits, including non-qualified deferred compensation options
- Reviewing beneficiary and ownership designations for effectiveness with gifting, income tax and estate tax plans
- Reviewing and developing appropriate risk management strategies for your family and your goals

- Providing alternate tax strategies and consequences of strategies
- Completing your financial plan to achieve your financial goals in the most efficient method possible and solve financial issues

Our team works with you and your HR department to ensure that a transition from work to another job or to retirement is appropriate, and we help you address the multiple details involved.

Financial Planning Consultations

Sometimes clients just want answers for one or two pressing issues. To meet this need, we consult in the following areas for an hourly fee. A consultation will address any or all of the following areas of concern. The client and coach/planner will work together to select the specific areas to cover. These areas may include, but are not limited to the following:

- **Business Planning:** Whether you are thinking of starting, have started, are running, or are trying to exit from a business, this has a major impact on your personal financial situation. We help you understand the options and consequences of various decisions, so you can make informed decisions about what is best for you.
- **Cash Flow and Debt Management:** We look at your income and expenses and help you craft a plan, so that you can get what you want from your labors and money. Advice on efficiently managing your debt, establishing cash reserves and systems, and planning for non-routine expenses are part of this program.
- **Risk Management and Insurance Product Management:** We will assess your risks and how they could have a significant adverse impact on your financial security. Such risks include premature death, disability or medical issues. We will evaluate the steps you are taking to mitigate those risks to see if your plans and products will provide the protection you desire. We will analyze your life, health, disability, long term care, liability and property concerns, and work with your insurance providers to evaluate the products and whether and how they are meeting your needs.
- **Employee Benefits Optimization:** Your employer may provide you with a great benefit package, so we want to help you be sure you are taking the maximum advantage of your benefits. If you are a small business owner, we can help you structure an affordable package that benefits you and your employees.
- **College Funding and Other Goals:** Whether it's paying for your own college, a child, or a grandchild, college funding planning can make a big difference in the costs associated with tuition, books, and room and board. This analysis includes the projection of amounts needed to achieve your goals, along with advice on ways for you to save the desired amount. We'll help you examine various strategies and the pros and cons of them, including tax savings, control of investments, potential penalties, etc. The same thoughtful analysis is applied to other goals you may have such as buying a second home or funding a charitable legacy.
- **Retirement Planning:** We will help you establish acceptable income ranges, potential retirement ages, and help you define both saving, investment and cost containment strategies designed to improve the likelihood of achieving your financial goals. If you are near or in retirement, we provide advice to help minimize the risk of running out of money or having to drastically alter your lifestyle. Social security, pensions, annuities, investments, and reverse mortgages are all strategies that are considered and evaluated. Our goal is to help you understand how they can work together efficiently, given your specific situation.
- **Transition planning:** Moving between jobs, getting a divorce, adoptions, long term care issues, serious illnesses, parent's dependency, deaths, inheritances or extra financial costs can create

havoc and require critical financial decisions to be made. We can help evaluate the issues and consequences that need to be considered. We will help explore alternatives and give you the information you need to make an informed decision.

- **Estate and Legal Planning.** We are NOT attorneys and always recommend that you consult with a qualified attorney. We are familiar with estate planning and legal document issues and can help make sure you understand your current plan, how it matches up with your beneficiary designations, and what documents you may be missing. Frequently, we will participate in joint phone calls between you, family members, and your legal advisors, if it is needed to make sure that your goals and documents are congruent. While most of our clients are not going to be subject to estate taxes, there are some who may inherit significant wealth and we can assist those clients in understanding how to prepare and protect that wealth.
- **Tax Planning Strategies:** We are always looking for strategies that allow our clients to accomplish their goals most efficiently and finding any potential tax savings strategies is always part of that process. We may make suggestions, but always recommend that you consult with a qualified tax professional. We are always willing to participate in phone calls with you and your advisor. We have a CPA we work with that offers discounts to FFC clients.
- **Pre & Post-Divorce Planning:** In conjunction with your legal counsel, and other applicable parties, we will assist you in evaluating your financial settlement options, including but not limited to valuation of retirement benefits, non-qualified (after-tax) assets, physical property and income equalization and support alternatives.
- **Career Readiness Assessment and Coaching:** We will offer you guidance on an optimal career path to help maximize your lifetime earnings power, which will lead to greater financial wellness and growth. The methodology used is the Highlands Ability Battery (HAB) and Whole Person Model (www.highlandsco.com), which empowers you to make career and life decisions based upon your natural abilities. Raymond Giese, MS, CFP® is a Highlands Certified Consultant and is trained to administer and interpret the HAB. We use this program to pinpoint optimal career paths for you, leading to a more productive, satisfying and rewarding life – improving your lifetime earnings power and positioning you to save and invest more for your long-term goals leading to financial freedom. The initial engagement includes:
 - the online assessment via the Highlands Ability Battery
 - reports detailing the results
 - copy of the book entitled "Don't Waste Your Talent" outlining the Whole Person Model
 - two hour, one-on-one meeting to discuss the results

Ongoing coaching includes a 45 minute, one-on-one coaching session each month, along with access to the Coach via email to answer questions in between sessions.

An alternative is a monthly virtual group session at a much-reduced rate, much like our clubs. We will go through a structured discovery process using the book entitled "Don't Waste Your Talent" to help you develop your career map. We will discuss each chapter – representing one of the 8 steps in the Highlands Whole Person Model – and how it can benefit you in your quest. We will also discuss the exercises at the end of each chapter and share what we have learned about ourselves and support each other throughout the process. Additionally, there will be a one-on-one session to discuss the completed career map and how you will proceed. You may end the program at any time with 30 day's notice, but we anticipate a 6 – 12 month process.

No matter which financial planning service you engage us in, we are required to state and want you to know, when a conflict exists between the interests of our firm and the interests of our client, you. For that reason, you have the right to choose whether to act or not act upon our recommendations. If you elect to

act on any of the recommendations, you, the client, have the right to choose where to implement the transaction. Remember, you have the right to take any recommendations and utilize other sources for implementing our recommendations, whether they are for products we may offer such as investments or products we do not sell such as insurance products. We want our clients to act in their own best interest. We have a fiduciary duty to place your interest before our own, but we are still human and can have errors in judgment. So, if you think something is a better option, talk with us about it and utilize the best option for you.

Speaking & Seminar Services

Seminars are offered to the public or to specific groups on a variety of financial topics. Fees range from \$0 to \$15,000, with satisfaction guaranteed or 100% of the fee is refunded. FFC clients do not pay fees to attend seminars, and, in some instances, non-clients are provided with special event codes that allow for either discounted or free seminar admission.

Our coaches are also public speakers on investing, financial wellness and utilization of behavioral economics to help people change their financial behaviors. Generally, fees for speaking engagements range from \$0 to \$15,000 plus travel expenses, depending on sponsor, date, location and program requested. For all speeches, 50% of the fee is required prior to the event, with the balance due at the conclusion of the event. Speaker fees are nonrefundable.

Investment Advisory Services

We offer investment advisory services through two different programs.

The first is by recommending clients, where appropriate, to Betterment Institutional ("Outside Managers") on a fee-only basis for model portfolio and investment advisory services. We assist clients in selecting an appropriate allocation model by completing the Outside Manager's investor profile questionnaire, interacting with the Outside Manager, tailoring the investment model and implementing investment changes on a discretionary basis, and reviewing the Outside Manager. You can find more in item 8 about our review process and analysis of outside managers. The Outside Money Managers we use offer low expense ETFs investment alternatives.

The second program is designed for those clients who have more extensive assets and wish continuous advice based on their goals and objectives. We develop a personal investment policy with an asset allocation target and create and manage the portfolio based on that policy and allocation target. Our investment methodology emphasizes the need to focus on achievement of one's goals while minimizing risk and is depicted by the 7Twelve® Portfolio (www.7twelveportfolio.com). 7Twelve is a multi-asset balanced portfolio developed by Craig L. Israelsen, Ph.D. in 2008. We implement it through a relationship with T.D. Ameritrade using low cost index funds. Unlike a traditional two-asset 60/40 balanced fund, the 7Twelve balanced strategy utilizes multiple asset classes to enhance performance and reduce risk. It is not based upon beating overall market returns and thus may not be appropriate for every client – in which case we will refer clients to other appropriate sources.

We limit our outside manager recommendations to core products that we know well and complete due diligence on. Thus there are some types of investments that you cannot acquire through us or that cannot be retained when working with us. We will gladly provide you the pros and cons, and even referrals to

other advisors who work with products that we do not use. We have thoroughly vetted the CFP®s that maintain their own firms that contract with us to deliver services. They have different money management styles and we frequently recommend one of those individuals. This, of course, can be a conflict of interest since we have a vested interest in them continuing to work with us. We do not receive any direct compensation from them for referrals. When making a referral to another individual for investment management services, we will provide you with a detailed review of the pros and cons, including fees that we encourage you to explore and ask for clarification if you don't understand some of the materials. You can read more about our investment philosophy under the section called Methods of Analysis, Investment Strategies and Risk of Loss.

It is important for you to know that we will only provide investment advisory services to those clients who have completed and joined a club or contracted for a financial planning engagement. We believe that we are better equipped to make investment recommendations when both parties are clear on goals, resources and potential issues, and who participate in annual update meetings at a minimum. We meet with clients on a periodic basis and expect clients to keep us informed about changes to their personal situation, suitability, and any new or revised restrictions to be applied to the account. Fees related to this service are outlined in item 5 of this brochure. We do not receive compensation from other advisors for these referrals and we will always provide you with the names of several to interview. We can discuss your particular situation if that category applies to you, as some clients prefer the basic investment style we offer or wish to manage some money themselves or split between advisors. However, we believe it is important to understand what you may be gaining or losing either way. You can read about our referral process and selection process under Other Financial Industry Activities and Affiliations.

We do not participate in a wrap fee program.

Because this is a fairly new service, we have minimal assets under management with less than \$300,000. You can read about our investment experience under the bios of the partners and coaches under FFC umbrella.

Fees and Compensation

Clients and employers pay for Fiscal Fitness Clubs of America memberships, fees for financial planning or consulting, and investment advisory services. We do not receive commissions from insurance companies, banks, or product sales of any kind. Our fees come from you the client, your employer, or investment advisory services only. We reserve the right to change our fees with 30 day's notice and to discount our fees based on circumstances based on an advisor's request and approval by a partner. If additional work or special requests are made that deviate from our program, you will be offered a quote in writing.

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

Additionally, we are so confident that we will bring value to our relationship that we have a 6-month full refund of any fees paid by individuals upon request after an exit interview with a partner. Employer payments are refunded less expenses incurred in customization of the services.

Fiscal Fitness Club Membership

Our Fiscal Fitness Clubs monthly fee is \$59 per month. Your monthly fee covers the monthly activities with your coach, access to the webinars and recorded classes, discounts from affiliate CPAs, Enrolled Agents, attorneys, and all of the forms and tools provided to club members. When you end your monthly fees, the services are discontinued. We ask for 30 days' notice. It's that simple. Employers and groups can receive discounts and some employers choose to subsidize the costs for employees. Check with your employer to see if they have or are interested in contracting with Fiscal Fitness Clubs for employees. If you create your own club, a discount is provided to all members.

An optional service for club members is the creation of a baseline financial plan. The cost for a baseline plan is \$499.

Discounts in fees are available for groups.

Individual Ongoing Comprehensive Financial Planning Services

The initial financial planning fee will range between \$999 and \$8,000 based on the complexity of the situation. For example, business owners with several sources of income and complex liability issues need different analysis than a single adult in their first job. While there are factors that influence these costs, there is some discretion and negotiation available. Because we are committed to fiscal responsibility, we also negotiate payment plans. We are so confident of our value and your success that we have a money back guarantee for that 12-month period fee. If you are dissatisfied with the services for any reason, upon an exit interview with a partner of the firm, we will refund your monthly payments for the last year.

Once the financial plan is delivered, there is a two-week period where the planner is available to answer any questions and help provide the information you need to be able to make informed decisions. Upon the end of that two-week period, you may choose to continue with the planner on a retainer to help you with any implementation, further analysis, routine updating and financial coaching for a fee of \$125 per month. We ask for 30 day notice to terminate the ongoing coaching.

Corporate Executive Transition Plan

The initial planning fee ranges from \$5,000 to \$10,000 depending on the complexity of the tax situation and estate planning situation. Again, while there are factors that influence these costs, there is some discretion and negotiation available. Because we are committed to fiscal responsibility, we also negotiate payment plans. We are so confident of our value and your success that we have a money back guarantee for that 12-month period fee. If you are dissatisfied with the services for any reason, upon an exit interview with a partner of the firm, we will refund your payment.

Financial Planning Consultations

You can engage us for one or a few aspects of your financial life on an hourly rate of \$200 (a minimum of 2 hours) or a flat fee negotiated based on the complexity of the project. Fees for projects may vary depending on the complexity of the case and the fee may be negotiable. Consultation fees are due one half up front and the balance at the presentation of the planning report. In the event of early termination by client, any fees for the hours already worked will be due and any unearned fees will be refunded.

Career Readiness Assessment and Coaching

The fee is \$495 for the initial assessment and consultation and incorporates the fees for Highlands Ability Battery. Ongoing coaching is \$125 per month and includes a 45 minute one-on-one coaching session each month, along with access to the Coach via email to answer questions in between sessions.

An alternative is a monthly group session at a much-reduced rate of \$59 per person per month. If you join with a friend (2 or more sign up) then the monthly price is discounted to \$45 per month. (It's more fun and having a friend so you can hold each other accountable for career progress improves success!)

Utilizing CFPs with outside firms to deliver Fiscal Fitness Clubs services

Fiscal Fitness Clubs of America does enter into contracts with individuals who have their own RIAs who wish to provide our clients with education, coaching, planning and lead peer support groups. FFC vets, selects, trains and pays these individuals who are located in a variety of states and enhance our services with their own areas of expertise-We select, evaluate and monitor coaches who are affiliated with us to make sure that they follow the same fiduciary standard and place our clients' interest first. You can find the trained coaches and their locations on our website.

Investment Advisory Fees

Our standard advisory fee is based on the market value of the account and is calculated as follows:

Account Value	Annual Advisory Fee
\$0 - \$500,000	0.85%
\$500,001 and up	0.80%

Please note, the above stated fee is for both programs 1) Outside Manager/Betterment, LLC & 2)TD Ameritrade. This fee structure also includes the Outside Manager's fee of 0.20 for Betterment. The annual fees are negotiable, pro-rated and paid in arrears on a quarterly basis based on the account's average daily balance.

If you choose to follow our recommendations for investment management under program 1, you will sign a separate contract with the Outside Manager. The custodian, Betterment, LLC (CRD 149117) and the Outside Manager will debit your account for both the Outside Manager's fee and will debit Fiscal Fitness Clubs of America's advisory fee and will remit our fee to us. No increase in the annual fee shall be effective without agreement with you by signing a new agreement or amendment to our current advisory agreement.

If you choose to follow our recommendations for investment management under program 2, you will sign a separate contract with us and the custodian. The custodian, TD Ameritrade (CRD) will debit your account for both the Outside Manager's fee and will debit Fiscal Fitness Clubs of America's advisory fee and will remit our fee to us. No increase in the annual fee shall be effective without agreement with you by signing a new agreement or amendment to our current advisory agreement.

Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least

15 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the account.

These fees are deducted directly from your managed account. Please see Item 15 for further information. The Advisory Agreement and the custodial/clearing agreement will authorize the custodian to debit the account for our fee and remit the fee directly to us in compliance with regulatory procedures

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses, which may be incurred by you. You may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs. We encourage you to read and ask us about any fees you are charged.

Item 12 further describes the factors that we consider in selecting or recommending custodians for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

Finally, please note, lower fees for comparable services may be available from other sources. Only you can decide whether the combinations of services you are receiving are worth the fees that you are paying. While we work hard to keep expenses low and advice values high, there may be other options.

5. Performance Based Fees and Side by Side Management

We do not participate in these activities.

6. Type of Clients

Clients of Fiscal Fitness Clubs of America generally include individuals, families, employer groups, and small business owners. We do not provide investment advisory services to pension and profit sharing plans, business entities, investment companies, trusts, estates and/or charitable organizations, but we do offer Fiscal Fitness Clubs to these organizations for their employees.

We have no account minimums; however, the types of investments or investment vehicles we offer may not be appropriate for some clients. Depending on our client's needs, we may refer them to purchase an investment that we do not offer. We are not compensated for such referrals.

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

We refer clients to third-party investment advisers ("outside managers") or to an outside custodian. Our analysis of outside managers involves the examination of the experience, expertise, investment philosophies, and past performance of the outside managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations and leverage as part of our overall periodic

risk assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, remember, we do not control the underlying investments in an outside manager's portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Passive Investment Management

We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes and are broadly diversified. The funds that are used are typically index mutual funds or exchange traded funds.

Portfolios under both programs listed above are then managed by shifting all portfolios in the same investment model at the same time. Betterment shifts based on market analysis and is sometimes referred to as "Robo" advising. This simply means using a team of market specialists; their best advice is implemented for portfolios with the same characteristics of time frame and risk rather than each individual portfolio being evaluated.

The 7Twelve model rebalances to maintain the desired asset allocation and is reviewed by the individual advisor for tax consequences and individual client appropriateness.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (typically fairly low due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market. However, there are some who do outperform

Material Risks Involved

It is important to understand the risks you are facing when investing through Fiscal Fitness Clubs.

We have made a conscious choice to limit the types of investments we utilize, so we can better monitor the risks. Below are the risks that apply to the types of investment accounts we recommend. This doesn't mean that we won't be addressing other risks you may be facing with assets that are not under our supervision in our financial planning services.

All investing strategies we offer involve risk and may result in a loss of your original investment, which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable, or find buyers at any price.

Concentration Risk: Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true; bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities that We Recommend

Apart from the general risks outlined above, which apply to all types of investments, specific securities may have other risks.

Exchange Traded Funds (ETFs) prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock

trading generally. The Adviser has no control over the risks taken by the underlying funds in which client's invest.

There may be other risks related to stocks, bonds, derivatives, concentrations, and options that are incorporated by the managers and funds we select. Read the prospectus carefully to understand any risks you may be accepting.

9. Disciplinary information

We are required to disclose to you any legal or disciplinary events that could be material to your consideration of Fiscal Fitness Clubs of America and the facts related to those events. Carol Craigie, MA, ChFC®, CFP® has been in the financial services industry in various capacities since 1982 and has had no complaints, legal, or disciplinary events during her career. Neither she nor her partner, Catalina Franco-Cicero, MS, CFP® have any criminal records, bankruptcies or other violations or complaints. In addition, neither does Ray Giese or Aubrey Coleman. We encourage you to check out this information yourself through state regulatory bodies and other sources.

10. Other Financial Industry Activities and Affiliations

No employee or contractor is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No employee or contractor is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

We do have relationships with organizations and individuals that we believe will benefit our clients. You can meet our coaches and assistant coaches that work solely with us in the supplemental information. You can find the Coaches we hire and supervise that have their own firms on our website. Please feel free to reach out to any partner if you have questions about them.

We have formalized a relationship with a CPA, John McCarthy, to provide tax services and be part of our corporate executive transition team. He also offers discounted tax services to our clients. We do not receive any compensation from him for tax work that he does. He may from time to time refer clients to us but that is not contracted or expected and has no influence on our decision to offer his services to our clients. Clients are free to use any tax professional of their choice.

We also have created relationships with several estate attorneys who have agreed to provide discounted fees to our clients as a result of our coaches ensuring that all the information needed is reviewed and in one place. We do not receive any fees from the attorneys nor do they receive any referral fees for recommending Fiscal Fitness Clubs. Clients are free to use any law professional of their choice.

We only receive compensation directly from clients. We do not receive compensation from any outside source. We do however refer investment management business sometimes to those coaches that offer that service that work with us which could be considered a conflict of interest.

Recommendations or Selections of Other Investment Advisers

As referenced in Item 4 of this brochure, Fiscal Fitness Clubs of America recommends clients to an Outside Manager of the indexed ETFs to manage their accounts. In the event that we recommend an Outside Manager, please note that we do not share in their advisory fee. Our fee is separate and in addition to their compensation (as noted in Item 5) and will be described to you prior to engagement. Again, you always have the right to select to use or not use a manager we recommend. Additionally, Fiscal Fitness Clubs of America will only recommend an Outside Manager who is properly licensed or registered as an investment adviser.

11. Code of Ethics, Participating or Interest in Client Transactions and Personal trading

Some advisors act as fiduciaries in some circumstances and not in others. We choose in all of our transactions to act as a fiduciary. This means that we commit to putting our clients interest above our own and you can take us to court under that standard if we do not. It is the highest legal standard in our profession. As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations, but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below:

- **Integrity** - Associated persons shall offer and provide professional services with integrity.
- **Objectivity** - Associated persons shall be objective in providing professional services to clients.
- **Competence** - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- **Fairness** - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- **Confidentiality** - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- **Professionalism** - Associated persons' conduct in all matter shall reflect credit of the profession.
- **Diligence** - Associated persons shall act diligently in providing professional services.

We will, upon request, promptly provide a complete Code of Ethics.

When it comes to investments it is important that we disclose that our firm and its “related persons” (associates, their immediate family members, etc.) may buy or sell securities the same as, similar to, or different from, those we recommend to clients for their accounts. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. Clients often have different objectives and risk tolerances. At no time, however, will our firm or any related party receive preferential treatment over our clients.

In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates’ transactions in specific securities transactions. Any exceptions or trading pre-clearance must be approved by our Chief Compliance Officer in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

12. Brokerage Practices

Factors Used to Select Custodians

Brokers and dealers are selected based upon a number of factors, including: providing services of direct benefit to clients such as acting as custodian for the account, providing services that facilitate trading, performance evaluation and other information on securities, their inventory of securities and proven ability to execute, clear and settle transactions, ability to report promptly and accurately, provide prompt and efficient delivery of securities. Fiscal Fitness Clubs of America, LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

Research and Other Soft-Dollar Benefits

We do not participate in soft dollar arrangements.

Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

For financial planning clients, we do not recommend specific broker-dealers nor do we have a concern over which broker-dealer is chosen.

For investment advisory services clients, we do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients’ money over using a lower-cost custodian.

MTG, LLC dba Betterment Securities

As mentioned earlier, we offer two different programs with two different custodians.

When working with clients through Betterment, Fiscal Fitness Clubs of America does not maintain custody of your assets that we manage; although we are deemed to have custody of your assets if you give us authority to withdraw advisory fees from your account (see Item 15—Custody, below). Your assets must be

maintained in an account at a “qualified custodian”, generally a broker-dealer or bank. We may recommend that our clients use MTG, LLC dba Betterment Securities (“Betterment Securities”), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Betterment Securities. Betterment Securities will hold your assets in a custodial account and buy and sell securities when we and/or you instruct them to. While we may recommend that you use Betterment Securities as custodian, you will decide whether to do so and will open your account with Betterment Securities by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Betterment Securities, then we cannot manage your account on Betterment Institutional (defined below).

Your Custody Costs

For our clients’ accounts that Betterment Securities maintains, Betterment Securities generally does not charge you separately for custody services, but is compensated as part of the Betterment Institutional (defined below) platform fee, which is a percentage of the dollar amount of assets in the account in lieu of commissions. We have determined that having Betterment Securities execute trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “Factors Used to Select Custodians and/or Broker-Dealers”).

Services Available to Us via Betterment Institutional

Betterment Securities serves as broker dealer to Betterment Institutional, an investment and advice platform serving independent investment advisory firms like us (“Betterment Institutional”). Betterment Institutional also makes available various support services, which may not be available to Betterment’s retail customers. Some of those services help us manage or administer our clients’ accounts; while others help us manage and grow our business. Betterment Institutional’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of Betterment Institutional’s support services:

1. **SERVICES THAT BENEFIT YOU.** Betterment Institutional includes access to a range of investment products, execution of securities transactions, and custody of client assets through Betterment Securities. Betterment Securities’ services described in this paragraph generally benefit you and your account.
2. **SERVICES THAT MAY NOT DIRECTLY BENEFIT YOU.** Betterment Institutional also makes available to us other products and services that benefit us, but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts, such as software and technology that may:
 - a. Assist with back-office functions, recordkeeping, and client reporting of our clients’ accounts.
 - b. Provide access to client account data (such as duplicate trade confirmations and account statements).
 - c. Provide pricing and other market data.
 - d. Assist with back-office functions, recordkeeping, and client reporting.

3. **SERVICES THAT GENERALLY BENEFIT ONLY US.** By using Betterment Institutional, we may be offered other services intended to help us manage and further develop our business enterprise.

These services could include:

- a. Educational conferences and events.
- b. Consulting on technology, compliance, legal, and business needs.
- c. Publications and conferences on practice management and business succession.

Our Interest in Betterment Securities' Services

The availability of these services from Betterment Institutional benefits us because we do not have to produce or purchase them. In addition, we don't have to pay for Betterment Securities' services. All broker/dealer and custodian funds offer services to induce advisors to utilize them. These services may be contingent upon us committing a certain amount of business to Betterment Securities in assets in custody. Therefore, we have an incentive to recommend that you maintain your account with Betterment Securities, based on our interest in receiving Betterment Institutional and Betterment Securities' services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that our selection of Betterment Securities as custodian is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities' services and not Betterment Institutional and Betterment Securities' services that benefit only us.

TD Ameritrade Inc.

The Fiscal Fitness Clubs of America, LLC also recommends TD Ameritrade to clients because of the competitive transaction fees, account statement clarity, electronic access to client accounts, availability of research, and overall high service levels.

Fiscal Fitness Clubs of America, LLC participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the Program.

There is no direct link between Fiscal Fitness Clubs' participation in the program and the investment advice it gives to our clients, although we do receive benefits through our participation in the program that are not available to retail investors. These benefits include the following products and services provided without cost or at a discount:

- Receipt of duplicate client statements and confirmations
- Research related products and tools, consulting services
- Access to a trading desk serving participants
- Access to block trading
- The ability to have advisory fees deducted directly from client accounts
- Access to electronic communications network for client order entry and account information
- Access to mutual funds with no transaction fees and to certain institutional money managers
- Discounts on compliance marketing, research, technology and practice management products or services by third party vendors.

- TD Ameritrade may also have paid for business consulting and professional services received by Fiscal Fitness Clubs related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Fiscal Fitness Clubs but not benefit client accounts. They assist us in managing and administering client accounts, including accounts not maintained at TD Ameritrade. They also have services that may help develop our business. These benefits do NOT depend on the amount of brokerage transactions directed to TD Ameritrade. We endeavor at all times as part of our fiduciary duty to put the interest of our clients first. However, clients need to be aware that this can be a conflict of interest and may indirectly influence us to direct people to TD Ameritrade! Ask questions of your coach or one of the partners if you have concerns!

Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

Aggregating (Block) Trading for Multiple Client Accounts

Outside Managers used by Fiscal Fitness Clubs of America may block client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A.

Financial planning-only clients will be responsible for negotiating their own trading costs with their broker-dealer.

13. Review of accounts

In order to make sure that your investments are matching your risk profile and the plans that are agreed upon, Carol S. Craigie or Catalina M. Franco-Cicero (one of the partners other than the investment manager) will review how the funds are invested on a quarterly basis compared to your goals. Risk profiles and other information about your personal situation are always reviewed annually as part of our financial planning services, which is a requirement to be an investment advisory services client.

Events that may trigger a special review would be unusual performance, addition or deletions of client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per your needs.

You always will receive trade confirmations from the custodian for each transaction in your accounts, as well as monthly or quarterly statements and annual tax reporting statements from the custodian showing all activity in the accounts, such as receipt of dividends and interest. You should review these documents carefully and let us know if you see anything that looks suspicious or wrong!

Fiscal Fitness Clubs of America will not provide written reports to you on your investments in addition to statements you receive from the custodian.

14. Payment for Client Referrals

We do not receive any economic benefit, directly or indirectly from any third party for advice rendered to our clients. Nor do we directly or indirectly compensate any person who is not contracted to deliver services from FFC.

We receive a non-economic benefit from TD Ameritrade and Betterment in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at TD Ameritrade and Betterment. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

15. Custody

If you are an investment advisory services client, you will receive at least quarterly statements from the qualified custodian that holds and maintains your investment assets via email and can also be found on your dashboard at Betterment or TD Ameritrade. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

For client accounts in which Fiscal Fitness Clubs of America directly debits their advisory fee:

1. On behalf of Fiscal Fitness Clubs of America, Betterment Institutional and/or TD Ameritrade will send an email notifying the client of when their quarterly invoice and statement are available on the clients' dashboard. The invoice will include the asset amount the fee is based on, a sample calculation, and the time period the fee covers.
2. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.
3. The client will provide written authorization to Fiscal Fitness Clubs of America permitting them to be paid directly for their accounts held by the custodian when establishing their contract on line through Betterment Institutional TD Ameritrade.

16. Investment Discretion

For those client accounts where we provide investment advisory services, we require discretion over client accounts with respect to allocation selection. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and any advisory agreements with Outside Managers, which will be signed by the client.

17. Proxy Voting Policies

Every investment firm gives you an opportunity to vote on the board of directors and certain types of policies or actions. You can vote those yourself or give the proxy to someone else to vote for you. Fiscal Fitness Clubs does not vote your client proxies. Therefore, you maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the investment assets. You will instruct the qualified custodian to forward to the copies of all proxies and shareholder communications relating to your investment assets.

If you would like our opinion on a particular proxy vote, you may contact us at the number listed on the cover of this brochure. In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

18. Financial Information

Registered investment advisers are required in this item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance, which would put you at more risk of losing money if the firm had financial difficulties.

Information about the Partners:



Carol

&



Catalina

Carol S. Craigie, MA, ChFC®, CFP® is a psychologist turned financial planner when her husband became totally disabled and she needed to support her family. She entered through the insurance industry and fell in love with financial planning. She has broad experience in the wealth industry. She was a successful financial planner, worked as a trust officer, and implemented the financial planning process in Norwest Bank trust department. Carol became the Director of Financial Planning for several large organizations

including Wells Fargo, JPMorgan Chase, and Key Bank, where she designed, implemented, and supervised multi-level financial planning services with thousands of advisors, brokers, trust officers, insurance representatives, portfolio managers, and client wealth advisors. She worked closely with the portfolio management teams to define the asset allocation models used through the planning services.

Throughout her career, Carol has frequently taught the entire CFP® curriculum, including investment management for various institutions. She has been a frequent key note speaker and has been interviewed as a result of her planning expertise. When Carol retired from managing planning in large institutions, she dedicated herself to figuring out how to deliver cost effective services to middle America, rather than just the rich. She also became a professor with the College for Financial Planning, where she wrote the textbook, designed and taught their CFP® capstone class, “Developing a Financial Plan” and wrote the textbooks on Financial Planning Process and Risk Management. She also serves on the National Board of Directors for the Financial Planning Association (FPA). Based her own experiences, she believes that taking control of your money and financial planning are both critical parts of everyone’s life and wants to make a positive difference in people’s financial future.

Carol and Catalina met through the mentoring program through the Financial Planning Association (FPA). Carol was impressed with Catalina’s dedication to the goal of helping clients achieve financial wellness and valued her bilingual abilities, dedication to the industry, and ethics. Catalina is a career changing wellness professional and adjunct professor from Barry University where she designed award winning wellness programs. She is an experienced and successful entrepreneur who understands the small business world. She developed a highly sought after model for summer camps for children that reinforced academic content while creating physically fit children. She understands the coaching process and also knows the importance of financial wellbeing. Over the past few years, she has developed educational programs for children and teens. Under the supervision of a CFP®, she has developed financial plans and coached individuals to financial success. As an immigrant, she understands the challenges of those who aren’t familiar with the American systems and language barriers. Catalina has achieved the CFP® designation. Combined, Carol S. Craigie and Catalina M. Franco-Cicero have teamed to create programs that are affordable and that help people achieve financial security.