

**Fiscal Fitness Clubs of America, LLC
17356 Cornerstone Lane
Parker, CO 80134**

**Carol S. Craigie, MA, ChFC®, CFP®
Managing Partner
Chief Compliance Office**

720-507-8535

www.fiscalfitnessclubs.com

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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 states of Colorado and Minnesota. 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Since our last ADV filing dated January 30, 2017, we have withdrawn from SEC registration and returned to State registrations only.

A note from Carol, Managing Partner:

As a CFP® Certificant, 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

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4. Advisory Business

Fiscal Fitness Clubs of America, LLC is registered as an Investment Advisor with the states of Colorado and Minnesota. 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 few years, we decided to expand our services to meet the needs of our clients to include individual financial planning, financial planning consultations, and helping people track their progress through financial tasks with assistance from our coaches. We specialize in working with clients who want to change their financial situation. Because we decided that actually managing money was a conflict of interest, we no longer manage funds and our Discretionary Assets Under Management (AUM) are zero.

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. Catalina M. Franco-Cicero, MS, CFP®, is the other 50% owner. While Catalina works for Tobias Wealth Management,

she is passionate about the mission and has contributed to the creation of Fiscal Fitness Clubs of America; thus, she continues to hold a stake in the company.

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

1. Smart Money Decisions program that provides information on making smart money decisions every day for a low annual subscription
2. The RoadMap Program which is an on-demand, self-directed roadmap to completing the tasks that lead to financial success and reduced stress
3. A low cost financial wellness program through a Fiscal Fitness Club membership
4. Individual plans or on-going comprehensive financial planning services
5. Corporate executive transition planning
6. Financial planning consultations

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 people need different ways of accomplishing these goals. For many people "knowing" and "doing" are not the same and they want a coach to help them learn the path.

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 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 program you choose—reading materials, attending classes, 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. Our program is designed to break these tasks into manageable small bites that take less than 3 hours a month to stay in control of your financial tasks.

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 sometimes specific analysis of issues supervised by a CFP®[®] Certified to address those issues that require knowledge. Cash flow control is based on habits so knowledge by itself is not enough. For those programs that include changing habits, we use brief coaching calls, tweets, e-mails, groups, and texts to help clients with changing habits around cash flow control, paperwork management, and several other habits that contribute to a lifetime of fiscal fitness. Your coach will be a trained Fiscal Fitness Clubs of America coach.

OUR SERVICES:

These services can be purchased by individuals, groups or companies wanting to attain Financial Wellness.

Smart Money Decisions: This program provides over 40 short videos and over 60 Money Minutes articles that with new ones delivered every month that provide current information that lays out what you

need to know and reliable current resources to help you make smart decisions to either save your money, avoid pitfalls or recognize scams. You also have access to a live or recorded Financial Solutions Webinars each month hosted by a CFP who can answer your specific questions on the topic. You can see the current list of all upcoming programs, list of Money Minutes and Videos on our website or [click](#) here.

Financial Task Roadmap: We have taken the primary tasks than an individual/family needs to do to create and stay on top of their financial world and broken them down into easy to manage tasks with all the education, tools and resources needed to efficiently accomplish these. This is a self-directed program that includes access to coaches' hours which are hosted by CFPs that can answer questions and give specific advice so that you can quickly accomplish your task with confidence. This includes the Smart Money Decisions program. You can find the full list of upcoming classes, monthly action challenges, and other resources on our website.

Make it Happen Fiscal Fitness Club Membership

For people looking for low cost financial planning, 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, to groups and individuals. People can create a club with friends or join a virtual club of like-minded individuals. The clubs lead people through the financial roadmap described above which is the process to fiscal fitness. The program starts with a series of Taking Control classes (kind of like "spring training") designed to jumpstart financial mastery through completing a series of assignments with the help of your coach. Steps include, but are not limited to, defining your financial goals and concerns, debt restructure analysis, establishing a spending plan and orientation to financial planning software.

After the session's assignments are complete, you 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 and getting tasks that you may tend to procrastinate on done.

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. During the year, you will be completing your own financial plan with the help of a CFP®.

Club Membership provides:

- Club meetings
- 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.
- All of the resources that are available through the Roadmap and Smart Money Decisions

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 club members 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. 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.

Custom Employer Financial Wellness Programs: We design programs to fit a company's needs. We can provide onsite or virtual one-on-one meetings with employees by our CFP® coaches acting under the fiduciary standard. We can arrange to have some or all presentations on site, for different shifts or recorded and posted on the company website. There are many variations available in both services and costs.

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.

Our individual ongoing comprehensive financial planning services involve working one-on-one with a financial planner over a set period. 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 monthly. 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 like 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. You can find detailed descriptions of these services on our [website](#). These areas may include, but are not limited to the following:

- **Cash Flow and Debt Management**
- **Student Loans**
- **Risk Management and Insurance Product Management**
- **Employee Benefits Optimization**
- **College Funding and Other Goals**
- **Retirement Planning**
- **Transition planning**
- **Estate and Legal Planning**
- **Tax Planning Strategies**
- **Pre- & Post-Divorce Planning**

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. Because we do not sell any products, manage money or receive referral fees, there is no monetary inducement for Fiscal Fitness Clubs to make specific recommendations. Remember, you have the right to take any recommendations and utilize other sources for implementing our recommendations, including other investment advisors. 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/webinars are offered to the public or to specific groups on a variety of financial topics. 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 and training engagements range from \$0 to \$15,000 plus travel expenses, depending on sponsor, date, location and program(s) 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 analyze investment portfolios for our clients but do not manage investments. We will evaluate risk tolerance, investment goals and time lines and make specific recommendations for managing your funds. We develop an asset allocation target and show you how to create and manage the portfolio based on that target. Our investment methodology emphasizes the need to focus on achievement of one's goals while minimizing risk. It is not based upon beating overall market returns and thus may not be appropriate for every client. If your goals and our model do not match, we will refer clients to other appropriate sources. We will provide a list of companies and information about their services and fees that you can either manage the funds yourself or hire an investment manager.

We have thoroughly vetted the CFP®s that maintain their own firms that contract with us to deliver services as coaches. They have different money management styles and we frequently recommend one of those individuals in addition to other investment management specialists. 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 or any other investment professionals for referrals. When making a referral to another individual for investment management services, we will provide you with a description of their methodology, services and review of the pros and cons, including fees. You can then interview these individuals and select the one that fits your needs the most. 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. You can read about our referral process and selection process under Other Financial Industry Activities and Affiliations.

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.

We do not participate in a wrap fee program or any other investment management programs.

5. Fees and Compensation

Clients and employers pay for the Smart Money Decisions, Roadmap or Make it Happen Fiscal Fitness Clubs of America memberships, and fees for financial planning, investment advice or consulting. We do not receive commissions from insurance companies, banks, or product sales of any kind. Our fees come from you the client or your employer only for financial planning and education services. **We reserve the right to change our fees with 30 days' 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.

Smart Money Decisions cost is \$19 per year and includes the videos, Money Minutes and Financial Solutions webinars.

The Financial Roadmap program cost is \$24 per month and includes the roadmap, access to the classroom, all live and recorded webinars, and the Smart Money Decisions material.

Make it Happen- Fiscal Fitness Clubs costs \$59 per month. Your monthly fee covers the monthly activities with your coach, access to the webinars and recorded classes, a secure cloud folder to organize your paperwork and share with your coach, discounts from affiliate CPAs, Enrolled Agents, attorneys, and all the forms and tools in our classroom. When you end your monthly fees, the services are discontinued.

You are provided 60 days to download any materials from the secure cloud folder. 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 or group 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.

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. For example, if you agree to enter the information yourself into our forms and upload the documents, a \$500 discount is provided.

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 6-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 six months.

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 days' 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 6-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.

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 and their activities with clients for both advice and compliance with laws and our standards. We 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.

Other Types of Fees and Expenses

We do not manage money or sell any products other than our services in financial planning and education. When we recommend investments through other organizations such as your 401k, it is important to know that you may pay brokerage commissions, transaction fees, and other related costs and expenses in addition to any fee for advice that you pay us. 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 or your investment advisor about any fees you are charged. Providing us information about your fees will help us craft a plan in your best interest.

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.

6. Performance Based Fees and Side by Side Management

We do not participate in these activities.

7. 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.

Because we do not manage investments, we have no account minimums. However, we do have an energy minimum. You need to commit to spending time on your financial tasks!

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. 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 believe in 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 with low costs. As such, if we are completing an investment analysis and recommendations for you, we will focus on passive investment styles with low costs.

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. You may desire active management and need to inform us of that preference when we are completing portfolio analysis.

Material Risks Involved

It is important to understand the risks you are facing when investing. We have made a conscious choice to limit the types of investments we analyze and make recommendations upon, 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 provide advice upon 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.

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 clients 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. None of the coaches allied with Fiscal Fitness Clubs have any criminal records, bankruptcies or other violations or complaints. 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 the managing partner, Carol Craigie, 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 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 because 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.

Catalina Franco-Cicero, a silent partner, is licensed as an investment adviser representative of Tobias Financial Advisors, a registered investment adviser. As such, Catalina Franco-Cicero, in her separate capacity as an investment adviser representative, is able to provide advisory services apart from Fiscal Fitness Clubs of America, for which she will receive separate and customary compensation. Catalina does not manage any assets or receive compensation for any financial planning services or engage in any client activities with Fiscal Fitness Clubs of America. Her work with Fiscal Fitness Clubs is limited to corporate strategy and content advising for our educational programs. Tobias Financial Advisors does on occasion, refer clients to Fiscal Fitness Clubs when clients do not meet their firm's requirements or profile just as they have in the past prior to Catalina joining them. Tobias is only one of the full service planning firms that Fiscal Fitness has vetted and provides on our referral lists in Florida that we provide to clients when clients want more services in investment management than Fiscal Fitness Clubs provides. Neither firm receives any compensation from the other firm. While Catalina Franco-Cicero endeavors at all times to put the interest of our clients first as part of our firm's fiduciary duty, you should be aware that the receipt of outside compensation itself creates a conflict of interest and may affect their judgment when making recommendations.

We only receive compensation directly from clients. We do not receive compensation from any outside source.

Recommendations or Selections of Other Investment Advisers

As referenced in Item 4 of this brochure, Fiscal Fitness Clubs of America will provide lists of investment managers and outside manager who could manage client accounts. Additionally, Fiscal Fitness Clubs of America will only recommend other advisors an Outside Manager who are 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 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 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, 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.

12. Brokerage Practices

We do provide a list of potential broker/Dealer/Custodians to use for our clients to implement our investment recommendations. We do not receive any compensation for these recommendations or referrals.

13. Review of Accounts

Carol Craigie, Managing Member and CCO, does monitor investment advice provided to clients by our coaches through random quarterly checks. A client may also ask for a specific review if they have concerns about recommendations made to them by a coach.

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. We do enter into contracts with companies such as Well-Being Coaches to promote our services. Upon vetting the company and its services, we agree to pay a negotiated percentage of fees collected to the company in exchange for them providing marketing services that promote Fiscal Fitness Clubs of America. They at no time talk with financial planning clients, have access to client information or are in any way related to clients other than their marketing services..

15. Custody

We do not custody investment accounts.

16. Investment Discretion

We do not accept investment discretion.

17. Proxy Voting Policies

We do not address voting policies for investments of our clients.

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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 \$1,200 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 Founder:



Carol Craigie

Carol S. Craigie, MA, ChFC®, CFP® is a psychologist who 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 served 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. She now works at Tobias Financial Advisors as a financial planner but retains a corporate consulting role and ownership of Fiscal Fitness Clubs. As an immigrant, she understands the challenges of those who aren’t familiar with the American systems and language barriers. Catalina continues to advise Fiscal Fitness Clubs on content and structure, so they can bring Financial Wellness to a diverse population.