

# Disclosure Brochure

ADV Part 2A

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August 2, 2017

This Brochure provides important information about the qualifications and business practices of CFO4Life Group, LLC. If you have any questions about the contents of this Brochure, please contact us at 214-637-9500. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. CFO4Life's registration as an investment adviser does not imply a certain level of skill or training.

Additional information about CFO4Life Group, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for CFO4Life Group, LLC is 287600.

## **Item 2 – Material Changes**

This is the initial filing of Form ADV Part 2A (the “Brochure”) by CFO4Life Group, LLC (“CFO4Life”), the successor to MSJC, LP dba CFO4Life, L.P. The advisory services of CFO4Life will remain the same as that of its predecessor.

However, this Brochure reflects new ownership of the predecessor firm’s advisory business. CFO4Life is a wholly owned subsidiary of Focus Operating, LLC which is a wholly owned subsidiary of Focus Financial Partners, LLC. CFO4Life is continuing the advisory business of the predecessor firm in all respects.

Since the initial filing of this Brochure on February 28, 2017 the following changes have occurred:

In July 2017, investment vehicles affiliated with Stone Point Capital LLC (“Stone Point”) and Kohlberg Kravis Roberts & Co. L.P. (“KKR”) each made an investment in Focus Financial Partners, LLC (“Focus”). This transaction resulted in certain funds managed by Stone Point collectively becoming a principal owner of Focus and the KKR investment vehicles collectively becoming a minority owner of Focus. Because CFO4Life is an indirect, wholly-owned subsidiary of Focus, the Stone Point and KKR investment vehicles are indirect owners of CFO4Life. Items 4 and 10 have been revised to reflect this new ownership structure.

Our clients are strongly encouraged to read this Brochure in its entirety prior to engaging CFO4Life for investment advisory or financial planning services. We will provide, or offer to provide, a copy of this Brochure annually to each of our clients. We may also provide updates between annual offers if there are material changes to the information in this Brochure. Our Brochure may be requested by contacting us at 214-637-9500.

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## **Item 4 – Advisory Business**

### **A. Introduction**

CFO4Life Group, LLC (“CFO4Life” or “the Firm”) is an SEC Registered Investment Adviser and, as of February 1, 2017, successor to the advisory business of its predecessor, MSJC, LP dba CFO4Life, L.P., CRD # 146904/SEC # 801-77180 (the “predecessor firm”). The predecessor firm was established as an SEC Registered Investment Adviser in 2006.

The oral and written communications we provide to you, including this Brochure, is information that you may use in your decision to hire us or continue a professional relationship with us. This Brochure provides information about our qualifications and business practices.

### **B. Ownership**

CFO4Life is part of the Focus Financial Partners, LLC (“Focus”) partnership. As such, CFO4Life is a wholly-owned subsidiary of Focus Operating, LLC (“Focus Operating”), which is a wholly-owned subsidiary of Focus. Focus also owns other registered investment advisers, broker-dealers, pension consultants, insurance firms, and other financial service firms (the “Focus Partners”), most of which provide wealth management, benefit consulting and investment consulting services to individuals, families, employers, and institutions. Some Focus Partners also manage or advise limited partnerships, private funds, or investment companies as disclosed on their respective Form ADVs.

In July 2017, investment vehicles affiliated with Stone Point Capital LLC (“Stone Point”) and Kohlberg Kravis Roberts & Co. L.P. (“KKR”) each made an investment in Focus Financial Partners, LLC (“Focus”). This transaction resulted in certain funds managed by Stone Point collectively becoming a principal owner of Focus and the KKR investment vehicles collectively becoming a minority owner in Focus. Because CFO4Life is an indirect, wholly-owned subsidiary of Focus, the Stone Point and KKR investment vehicles are indirect owners of CFO4Life.

Through an exclusive long-term arrangement with Focus, MGMT4Life LLC (the “Management Company”) has agreed to provide the services of its members to act as officers of CFO4Life and provide supervision, oversight, and operational support services to CFO4Life. Levi McMellian and Brian Chastain are principals of the Management Company and serve as Executive Officers of CFO4Life.

The advisory services and management at CFO4Life remain the same as that of the predecessor firm and CFO4Life is continuing the advisory business of the predecessor firm in all respects. CFO4Life manages all of the assets of the predecessor firm which, as of February 1, 2017, consisted of \$270,841,631 managed on a discretionary basis and \$264,250,568 on a non-discretionary basis.

While this brochure generally describes the business of CFO4Life, certain sections also discuss the activities of its personnel, including its officers, partners, directors, employees (or other persons occupying a similar status or performing similar functions) or any other person who provides investment advice on behalf of CFO4Life and is subject to the Firm’s supervision or control (each, a “Supervised Person”).

### **C. Financial Planning and Advisory Services**

CFO4Life offers the following services:

1. Comprehensive Financial Planning and Investment Management Services to affluent

- individuals and business executives;
2. Advisory Services to Retirement Plans; and
  3. Corporate Services – Investment Education and Financial Wellness.

A description of each service is provided below.

#### Comprehensive Financial Planning Services

CFO4Life offers personal comprehensive financial planning services to set forth goals, objectives and implementation strategies for the client over the long-term. The comprehensive financial plan may include recommendations for retirement planning, educational planning, estate planning, cash flow planning, tax planning and insurance needs and analysis. CFO4Life prepares and provides the financial planning client with a written comprehensive financial plan and performs quarterly, semi-annual or annual reviews of the plan with the client, dependent on the client's needs in accordance with the financial planning agreement. Clients should notify us promptly anytime there is a change in their financial situation, goals, objectives, or needs and/or if there is any change to the financial information initially provided to us.

Clients are under no obligation to implement any of the recommendations provided in their written financial plan. However, should a client decide to proceed with the implementation of the investment recommendations then the client can either have CFO4Life implement those recommendations or utilize the services of any investment adviser or broker-dealer of their choice.

CFO4Life cannot provide any guarantees or promises that a client's financial goals and objectives will be met.

#### Investment Management Services

CFO4Life offers investment management services on a discretionary basis. All investment advice provided is customized to each client's investment objectives and financial needs. The information provided by the client, together with any other information relating to the client's overall financial circumstances, will be used by CFO4Life to determine the appropriate portfolio asset allocation and investment strategy for the client. Financial planning services also are provided, depending on the needs of the client.

The securities utilized by CFO4Life for investment in client accounts mainly consist of registered mutual funds and exchange traded funds (ETFs), but we may invest in equity securities, corporate bonds, REITS and variable annuities, among others, if we determine such investments fit within a client's objectives and are in the best interest of our clients. Please refer to Item 8 for detailed information on our method of analysis and the risks involved with these types of securities.

#### Wrap Program

When appropriate, CFO4Life may allocate certain client assets to third-party managers, and specifically Abner Herrmann and Brock, who is accessed through Envestnet Asset Management, Inc.'s Wrap-Fee Program. Under these circumstances, clients will be assessed an all in one "wrap-fee" by Envestnet for custody, brokerage, investment management and performance reporting services, rather than individual trading and other costs. CFO4Life will provide clients a copy of Envestnet's Wrap-Fee Program Brochure prior to or concurrently with any asset allocations through the Envestnet platform.

### Advisory Services to Retirement Plans

CFO4Life offers discretionary and non-discretionary advisory services to 401K Plans, which may include, depending on the needs of the 401k Plan client, recommending, or for discretionary clients selecting, investment options for plans to offer to participants, ongoing monitoring of a plan's investment options, assisting plan fiduciaries in creating and/or updating the plan's written investment policy statements, working with plan service providers, and providing general investment education to plan participants.

Education for plan participants covers information regarding: financial planning; risk management; types of investments; estate planning; and taxes. These education services are provided in the form of written materials and seminars.

### Corporate Services – Investment Education and Financial Wellness

CFO4Life offers services to corporations that include investment education for corporate executives, economic updates for corporate investment committees and/or benefits coordinators, and financial wellness for corporate executives. Education for executives covers topics such as: financial planning; risk management; types of investments; estate planning; and taxes. These education services are provided in the form of written materials and seminars.

Economic updates are generally provided during face-to-face meetings covering items such as the state of the economy, forecasts for growth, inflation, interest rates and other key economic factors, and analysis of current levels of the stock market, recent news and other current hot topics.

Financial Wellness is a benefit that corporations can provide to their employees through CFO4Life wherein CFO4Life will meet with the employees to discuss overall objectives, needs and goals, and provide a written analysis and financial planning recommendations to the employees. Employees are under no obligation to implement any recommendations provided. However, should an employee decide to proceed with the implementation of the recommendations, then the employee has the option of entering into a separate engagement with CFO4Life and can either have CFO4Life implement the recommendations, or the employee can utilize the services of another investment adviser or broker-dealer of their choice.

## **D. Important Information Relating to CFO4Life's Services**

### Information Received From Clients

CFO4Life will not assume any responsibility for the accuracy of the information provided by the client. We are not obligated to verify any information received from the client or other professionals (e.g., attorney, accountant, etc.) designated by client, and CFO4Life is expressly authorized by the client to rely on such information provided. Under all circumstances, clients are responsible for promptly notifying CFO4Life in writing of any material changes to the client's financial situation, investment objectives, time horizon, or risk tolerance. In the event that a client notifies CFO4Life of changes in the client's financial circumstances or investment objectives, we will review such changes and recommend any necessary revisions to the client's portfolio.

### Client Agreements and Disclosures

Prior to engaging CFO4Life to provide services, the client will be required to enter into one or more written agreements with us setting forth the terms and conditions under which the Firm shall render its services (collectively, the "Agreement"). In accordance with Rule 204-3 under the Investment Advisers Act of 1940, as amended ("Advisers Act"), CFO4Life will provide this Brochure and one or more brochure supplements (Form ADV Part 2B) to each client prior to or contemporaneously with the

execution of the Agreement.

Neither CFO4Life nor the client may assign the written agreement without the consent of the other party. Transactions that do not result in a change of actual control or management of CFO4Life shall not be considered an assignment.

### **E. Assets Under Management**

As of June 30, 2017, the following represents the amount of client assets under management by CFO4Life on a discretionary and non-discretionary basis:

Type of Account	Assets Under Management (AUM)
Discretionary	\$307,705,493
Non-Discretionary	\$263,638,533
Total	<b>\$571,344,026</b>

As outlined in Item 10 below, certain IARs of CFO4Life are also registered representatives (RRs) with Ausdal Financial Partners (“Ausdal”), a registered broker-dealer and member of FINRA. Ausdal and CFO4Life are not affiliated companies. These RRs have client brokerage accounts that total \$259,950,266 in assets as of June 30, 2017. The brokerage assets are not managed by CFO4Life and are not included in the AUM amount listed above. Total advisory and brokerage assets as of June 30, 2017 are \$829,294,292.

## **Item 5 – Fees and Compensation**

### **A. Financial Planning and Advisory Fees**

CFO4Life charges fees based on a percentage of assets under management as well as fixed fees, depending on the particular types of services to be provided. The specific fees charged by CFO4Life for services provided will be set forth in each client’s Agreement.

#### *Fees for Comprehensive Financial Planning Services*

Clients that are receiving financial planning services only are charged an annual fixed fee ranging from \$10,000 to \$15,000, depending on the complexity of a client’s plan and services provided. Initially, 25% of the annual fee is due upon entering into the agreement with the Firm and the remainder of the annual fee is charged quarterly thereafter based on a calendar quarter. Actual fees charged are clearly outlined in the financial planning agreement and clients receive invoices reflecting the amount of the fee due and payable. Please refer to “Additional Information Regarding Fees” below for more detailed information regarding fees paid by CFO4Life clients.

#### *Fees for Investment Management Services*

Advisory clients are charged a quarterly fee based on the account’s assets under management (AUM) as of the close of business on the last business day of the preceding calendar quarter. Asset management fees are calculated and paid quarterly in advance based on the following annual percentages:

- 1.50% on \$0 to \$3,000,000
- 1.25% on \$3,000,001 to \$5,000,000
- 1.00% over \$5,000,000

Lower fees for comparable services may be available from other sources. These fees may be negotiated by CFO4Life under certain circumstances, and at the sole discretion of CFO4Life. Unless otherwise

arranged by the client, our advisory fees are automatically deducted from a client's account by the custodian of the account as soon as reasonably practicable after the end of each calendar quarter. For accounts opened or closed after the beginning of a new calendar quarter, our fees may be prorated. For new accounts CFO4Life generally will make the initial fee deduction shortly after the finalization of the client relationship.

#### Fees for Wrap Programs

Advisory clients that participate in Envestnet's wrap fee program are charged a separate fee on those assets. The wrap fee includes CFO4Life's advisory fee, fees to Envestnet as the program provider, and fees to the third party manager for investment management services. The wrap fee paid by clients in the wrap program differs from CFO4Life's typical investment management fee in that the wrap fee is inclusive of trade execution costs, while in a non-wrap program account, the client pays trade execution costs directly to the broker, and such costs are in addition to the investment management fee charged by CFO4Life.

Fees on wrap fee program accounts are negotiable between CFO4Life and the client, and are generally based on the client's total relationship with CFO4Life. Currently, the total annual account fee for wrap fee program accounts ranges from 1.00% to 1.65%, and may not exceed 3%.

#### Fees for Advisory Services to Retirement Plans

Retirement plan advisory clients may be charged an annual fixed fee or an asset based fee. The annual fixed fees range from \$30,000 to \$200,000, depending on the complexity of the services provided. Initially, 25% of the annual fee is due upon entering into the agreement with the Firm and the remainder of the annual fee is charged quarterly thereafter at the end of each calendar quarter. For retirement plan advisory clients subject to an asset based fee, following are the percentage fee amounts:

- .75% on \$0 to \$5,000,000
- .50% on \$5,000,001 to \$10,000,000
- .25% over \$10,000,000

Actual fees charged are clearly outlined in the client agreement and clients receive invoices reflecting the amount of the fee due and payable. Please refer to "Additional Information Regarding Fees" below for more detailed information regarding fees paid by CFO4 Life clients.

#### Fees for Corporate Services

Corporate clients are charged an annual fixed fee ranging from \$50,000 to \$250,000, depending on the actual services provided. Initially, 25% of the annual fee is due upon entering into the agreement with the Firm and the remainder of the annual fee is charged quarterly thereafter at the end of each calendar quarter. Actual fees charged are clearly outlined in the client agreement and clients receive invoices reflecting the amount of the fee due and payable. Please refer to "Additional Information Regarding Fees" below for more detailed information regarding fees paid by CFO4Life clients.

### **B. Additional Information Regarding Fees**

CFO4Life fees are negotiable and arrangements with any particular client may differ from those described above. CFO4Life may, in its sole discretion, waive its fees in their entirety for friends and family of the Firm and/or reduce its fees for certain clients, and could change the above listed fee amounts at any time.



Although CFO4Life believes that its fees are competitive, clients should understand that lower fees for comparable services may be available from other sources and firms. The fees charged by CFO4Life do not include charges imposed by third parties such as custodian fees and mutual fund fees and expenses. Client assets may also be subject to transaction costs, retirement plan administration fees (if applicable), deferred sales charges on mutual funds initially deposited in the account, 12b-1 fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Client assets invested in mutual funds will be subject to certain fees and expenses imposed directly by mutual funds to their shareholders, which are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the sponsor also imposes sales charges, a client may pay initial or deferred sales or surrender charges. These fees and expenses are separate from and in addition to the fees charged by CFO4Life. Accordingly, the client should review the fees charged by any mutual funds in which the client's assets are invested, together with the fees charged by CFO4Life, to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Additionally, clients may incur brokerage commissions and other execution costs charged by the custodian or executing broker-dealer in connection with transactions for a client's account. Clients should further understand that all custodial fees and any other charges, fees and commissions incurred in connection with transactions for a client's account will be paid out of the assets in the account and are exclusive of and in addition to the fees charged by CFO4Life. We do not share in any of these fees but we may elect at our option, to bear the cost of certain transactions under certain circumstances. Please refer to Item 12 of this Brochure entitled "Brokerage Practices" for additional important information about the brokerage and transactional practices of CFO4Life.

The Agreement between CFO4Life and the client will continue in effect until terminated by either party pursuant to the terms of the Agreement. CFO4Life's annual fee shall be prorated through the date of termination as defined in the Agreement and any remaining balance shall be charged or refunded to the client, as appropriate, in a timely manner.

### **C. Important Considerations**

#### **Compensation for Sales of Securities or Other Investment Products**

As described in Item 4, certain representatives of CFO4Life, in their individual capacities, also are registered representatives of Ausdal. In this capacity, these individuals may transact in various types of securities or investment products and may receive separate and typical compensation for doing so.

Certain IARs of CFO4Life also are licensed insurance agents that are licensed with LBMC II, LLC, an insurance agency owned by Levi McMellian and Brian Chastain and appointed with various life, health and disability insurance companies. In such a capacity they may offer insurance products as a recommendation to a client's financial plan and receive a normal and customary commission and other indirect benefits as a result of such a purchase.

Please refer to Item 10 below for detailed information regarding these arrangements, along with the conflicts surrounding such and the steps CFO4Life has in place to help mitigate the conflicts.

### **Item 6 – Performance-Based Fees and Side-by-Side Management**

CFO4Life does not charge performance-based fees (i.e., fees assessed based on a share of capital gains on

or capital appreciation of a client's assets). Consequently, CFO4Life does not engage in side-by-side management of accounts that are charged a performance-based fee with accounts that are charged another type of fee (such as assets under management). As described above, CFO4Life provides investment management services for a fee based upon a percentage of assets under management. Notably, accounts that are managed in the same investment style (e.g., moderately aggressive) may not be managed the same way due to the client's overall investment objective, asset size and account restrictions.

## **Item 7 – Types of Clients**

CFO4Life provides services to affluent individuals and business executives, trusts, estates, charitable organizations, retirement plans, corporations and other businesses. CFO4Life imposes a minimum portfolio size or a minimum initial investment of \$500,000 and a net worth of \$1,500,000 to open an account, but does reserve the right to waive these minimums or accept or decline a potential client for any reason in its sole discretion.

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

### **A. Methods of Analysis and Investment Strategies**

When providing investment advice, we base our analysis on creating a diversified portfolio (Asset Allocation Model) that is compatible with a client's goals, objectives, risk tolerance and time horizon for investment. CFO4Life evaluates the client's investment holdings using software such as Morningstar, E-Money, and Virtual Portfolio Manager. CFO4Life also utilizes a variety of financial newspapers, newsletters and magazines, such as the Wall Street Journal, Value Line, Dow Theory, and Upside to make investment recommendations.

Our recommendations and investments are based on the asset allocation model which considers each client's risk tolerance and time horizon for holding such investments. The Firm utilizes primarily equities, mutual funds and ETFs. For mutual funds and ETFs, we focus on allocating among three main asset classes: equities; fixed income; and alternative investments, such as commodities and REITS. CFO4Life monitors clients' allocations and may reallocate investments in an effort to reduce risk and increase performance. Depending on its due diligence CFO4Life may invest significant positions in cash and/or fixed income securities as a possible hedge against market movement which we believe may adversely affect a client's portfolio. In addition, for certain clients CFO4Life may utilize alternative investments and/or private funds, i.e. funds subject to a registration exemption under the federal securities laws. CFO4Life may sell certain investments for reasons that include, but are not limited to, overvaluation or overweighting of a position, change in the client's investment objectives and risk tolerance, and indications of severe and prolonged market downturns.

### **B. Risk of Loss**

Investing in securities involves a significant risk of loss which clients should be prepared to bear. CFO4Life's investment recommendations are subject to various market, currency, economic, political and business risks, and such investment decisions may not always be profitable. Clients should be aware that there may be a loss or depreciation to the value of the client's account. There can be no assurance that the client's investment objectives will be obtained and no inference to the contrary should be made.

Generally, the market value of equity stocks will fluctuate with market conditions, and small- stock prices generally will fluctuate more than large-stock prices. The market value of fixed income securities will generally fluctuate inversely with interest rates and other market conditions prior to maturity. Fixed

income securities are obligations of the issuer to make payments of principal and/or interest on future dates, and include, among other securities:

bonds, notes and debentures issued by corporations; debt securities issued or guaranteed by the U.S. government or one of its agencies or instrumentalities, or by a non-U.S. government or one of its agencies or instrumentalities; municipal securities; and mortgage-backed and asset-backed securities. These securities may pay fixed, variable, or floating rates of interest, and may include zero coupon obligations and inflation-linked fixed income securities. The value of longer duration fixed income securities will generally fluctuate more than shorter duration fixed income securities. Investments in overseas markets also pose special risks, including currency fluctuation and political risks, and it may be more volatile than that of a U.S. only investment. Such risks are generally intensified for investments in emerging markets. In addition, there is no assurance that a mutual fund or ETF will achieve its investment objective. Past performance of investments is no guarantee of future results.

Additional risks involved in the securities recommended by CFO4Life may include, among others:

- *Stock market risk*, which is the chance that stock prices overall will decline. The market value of equity securities will generally fluctuate with market conditions. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices. Prices of equity securities tend to fluctuate over the short term as a result of factors affecting the individual companies, industries or the securities market as a whole. Equity securities generally have greater price volatility than fixed income securities.
- *Sector risk*, which is the chance that significant problems will affect a particular sector, or that returns from that sector will trail returns from the overall stock market. Daily fluctuations in specific market sectors are often more extreme than fluctuations in the overall market.
- *Issuer risk*, which is the risk that the value of a security may decline for reasons directly related to the issuer, such as management performance, financial leverage, and reduced demand for the issuer's goods or services.
- *Non-diversification risk*, which is the risk of focusing investments in a small number of issuers, industries or foreign currencies, including being more susceptible to risks associated with a single economic, political or regulatory occurrence than a more diversified portfolio might be.
- *Value investing risk*, which is the risk that value stocks may not increase in price, may not issue the anticipated stock dividends, or may decline in price, either because the market fails to recognize the stock's intrinsic value, or because the expected value was misgauged. If the market does not recognize that the securities are undervalued, the prices of those securities might not appreciate as anticipated. They also may decline in price even though in theory they are already undervalued. Value stocks are typically less volatile than growth stocks, but may lag behind growth stocks in an up market.
- *Smaller company risk*, which is the risk that the value of securities issued by a smaller company may go up or down, sometimes rapidly and unpredictably as compared to more widely held securities. Investments in smaller companies are subject to greater levels of credit, market and issuer risk.
- *Foreign (non-U.S.) investment risk*, which is the risk that investing in foreign securities may result in the portfolio experiencing more rapid and extreme changes in value than a portfolio that invests exclusively in securities of U.S. companies. Risks associated with investing in foreign securities include fluctuations in the exchange rates of foreign currencies that may affect the U.S. dollar value of a security, the possibility of substantial price volatility as a result of political and economic instability in the foreign country, less public information about

issuers of securities, different securities regulation, different accounting, auditing and financial reporting standards and less liquidity than in the U.S. markets.

- *Interest rate risk*, which is the chance that prices of fixed income securities will decline because of rising interest rates. Similarly, the income from fixed income securities may decline because of falling interest rates.
- *Credit risk*, which is the chance that an issuer of a fixed income security will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of that fixed income security to decline.
- *Exchange Traded Fund (ETF) risk*, which is the risk of an investment in an ETF, including the possible loss of principal. ETFs typically trade on a securities exchange and the prices of their shares fluctuate throughout the day based on supply and demand, which may not correlate to their net asset values. Although ETF shares will be listed on an exchange, there can be no guarantee that an active trading market will develop or continue. Owning an ETF generally reflects the risks of owning the underlying securities it is designed to track. ETFs are also subject to secondary market trading risks. In addition, an ETF may not replicate exactly the performance of the index it seeks to track for a number of reasons, including transaction costs incurred by the ETF, the temporary unavailability of certain securities in the secondary market, or discrepancies between the ETF and the index with respect to weighting of securities or number of securities held.
- *Management risk*, which is the risk that the investment techniques and risk analyses applied by CFO4Life may not produce the desired results and that legislative, regulatory, or tax developments, may affect the investment techniques available to CFO4Life. There is no guarantee that a client's investment objectives will be achieved.
- *Real Estate risk*, which is the risk that an investor's investments in Real Estate Investment Trusts ("REITs") or real estate-linked derivative instruments will subject the investor to risks similar to those associated with direct ownership of real estate, including losses from casualty or condemnation, and changes in local and general economic conditions, supply and demand, interest rates, zoning laws, regulatory limitations on rents, property taxes and operating expenses. An investment in REITs or real estate-linked derivative instruments subject the investor to management and tax risks.
- *Investment Companies ("Mutual Funds") risk*, when an investor invests in mutual funds, the investor will bear additional expenses based on his/her pro rata share of the mutual fund's operating expenses, including the management fees. The risk of owning a mutual fund generally reflects the risks of owning the underlying investments the mutual fund holds.
- *Commodity risk*, generally commodity prices fluctuate for many reasons, including changes in market and economic conditions or political circumstances (especially of key energy-producing and consuming countries), the impact of weather on demand, levels of domestic production and imported commodities, energy conservation, domestic and foreign governmental regulation (agricultural, trade, fiscal, monetary and exchange control), international politics, policies of OPEC, taxation and the availability of local, intrastate and interstate transportation systems and the emotions of the marketplace. The risk of loss in trading commodities can be substantial.
- *Alternative Investments / Private Funds risk*, investing in alternative investments is speculative, not suitable for all clients, and intended for experienced and sophisticated investors who are willing to bear the high economic risks of the investment, which can include:
  - loss of all or a substantial portion of the investment due to leveraging, short-selling or other speculative investment practices;
  - lack of liquidity in that there may be no secondary market for the investment and none expected to develop;

- volatility of returns;
- restrictions on transferring interests in the investment;
- potential lack of diversification and resulting higher risk due to concentration of trading authority when a single adviser is utilized;
- absence of information regarding valuations and pricing;
- delays in tax reporting;
- less regulation and higher fees than mutual funds;
- risks associated with the operations, personnel, and processes of the manager of the funds investing in alternative investments.

There also are risks surrounding various insurance products that are recommended to CFO4Life clients from time to time. Such risks include, but are not limited to loss of premiums. Prior to purchasing any insurance product, clients should carefully read the policy and applicable disclosure documents.

Clients are advised that they should only commit assets for management that can be invested for the long term, that volatility from investing can occur, and that all investing is subject to risk. CFO4Life does not guarantee the future performance of a client's portfolio, as investing in securities involves the risk of loss that clients should be prepared to bear.

#### **Item 9 – Disciplinary Information**

Registered investment advisers, such as CFO4Life are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's or prospective client's evaluation of CFO4Life or the integrity of CFO4Life management. CFO4Life has no disciplinary information to disclose.

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

As noted above in response to Item 4, in July 2017, investment vehicles affiliated with Stone Point and KKR each made an investment in Focus. This transaction resulted in certain funds managed by Stone Point collectively becoming a principal owner of Focus and the KKR investment vehicles collectively becoming a minority owner in Focus. Because CFO4Life is an indirect, wholly-owned subsidiary of Focus, the Stone Point and KKR investment vehicles are indirect owners of CFO4Life. None of KKR, Stone Point, or any of their affiliates participates in the management or investment recommendations of our business.

As mentioned above in Items 4 and 5, certain IARs of CFO4Life also are RRs with the broker-dealer Ausdal. In this capacity, such RRs may offer securities or alternative investments and receive normal and customary fees or commissions as a result of these transactions. In addition, these individuals may receive additional ongoing 12b-1 fees for mutual fund purchases from the mutual fund company during the period that the client maintains the mutual fund investment. In addition, Mr. McMellian is an investment adviser representative of Ausdal. In his role as investment adviser representative, Mr. McMellian conducts investment advisory services and participates in referral fees paid to Ausdal by third party advisers for client referrals.

Clients should be aware that the receipt of additional compensation itself creates an inherent conflict of interest, and may affect the judgment of these individuals when making recommendations. CFO4Life and Ausdal are separate, nonaffiliated entities. Nevertheless, to the extent that a CFO4Life representative recommends the purchase of securities or other investment products where the representative receives commissions for doing so, a conflict of interest exists because the representative

may be incentivized to make recommendations based on the compensation received rather than on a client's needs.

Certain IARs of CFO4Life also are licensed insurance agents with LMBC II, LLC, an insurance agency (Texas license #183614), and appointed with various life, health and disability insurance companies. Messrs. McMellian and Chastain are the principal owners of LMBC II, LLC and there are times when CFO4Life IARs, including Mr. McMellian and Mr. Chastain, recommend the purchase of certain insurance products through LMBC II, LLC to CFO4Life clients as part of their financial plan. Upon purchase, the CFO4Life IAR in his capacity as an insurance agent will receive normal and customary commissions. Additionally, Messrs. McMellian and Chastain will receive indirect benefits due to the fact that as owners they share in the profits and losses of LMBC II, LLC.

In addition, Mr. McMellian and Mr. Chastain have an arrangement with Hub International TX, Inc., an unaffiliated property and casualty insurance agency, as well as CSG Companies, an unaffiliated employee benefits firm, wherein Mr. McMellian or Mr. Chastain may offer certain types of insurance products as a recommendation to certain CFO4Life clients. Under this arrangement, they will receive a portion of the normal and customary commissions paid as a result of such purchase. Furthermore, LMBC II, LLC has an arrangement with Grayhawk Insurance Group, LLC, an unaffiliated property and casualty insurance agency, wherein LMBC II, LLC and those IARs of CFO4Life who are licensed insurance agents under LMBC II, LLC may offer certain types of insurance products as a recommendation to CFO4Life clients. Similar to the HUB and CSG Companies arrangements, LMBC II, LLC and/or those IARs licensed as insurance agents under LMBC II, LLC will receive a portion of the normal and customary commissions paid as a result of such purchase.

Again, these arrangements present conflicts of interest to the extent that the insurance agent/IAR may be incentivized to make recommendations based on the commissions being paid to them and/or any indirect benefit received.

CFO4Life has also adopted certain procedures designed to mitigate the effects of these conflicts. As part of our fiduciary duty to clients, the Firm and our representatives endeavor at all times to put the interests of the clients first, and recommendations will only be made to the extent that they are reasonably believed to be in the best interests of the client. Additionally, the conflicts presented by these practices are disclosed to clients through this Brochure, client agreement and/or verbally prior to or at the time of entering into an Agreement. Clients are not obligated to implement recommended transactions through any CFO4Life representative or any particular broker-dealer or insurance carrier. Clients have the option to purchase any recommended investment and insurance products or services through brokers, carriers, or agents other than Ausdal, LMBC II, LLC, Hub International TX, Inc., CSG Companies, Grayhawk Insurance Group, or any recommended third party managers.

CFO4Life clients should understand that lower fees and/or commissions for comparable services may be available from other broker-dealers, insurance carriers and investment advisers.

The advisors of CFO4Life also may introduce their clients to a document storage and retrieval system through an affiliated company, SAFE4Life. This online service offers secure, anytime, anywhere access to confidential client documents and records, and is designed to serve as a flexible, simple system to consolidate and protect the client's important information. In such a capacity the advisors of CFO4Life may offer this online service and receive a normal and customary fee as result of this service.

Messrs. McMellian and Chastain also have ownership interests in the following companies:

- CFO Benefits, Inc. - a payroll company (each own 50%);
- LMBC II, LLC – a licensed insurance agency and also provides tax and business consulting services to corporations and certain retirement educational services to a corporation’s 401K Plan participants and other employees as requested (each own 47%);
- MGMT4Life LLC – the Management Company as described above in Item 4 (each own 45.86%);
- Safe4Life, Inc. – provides document storage (each own 50%); and
- 735 Plaza, LP – property owners of office building (each own 49.5%).

Among other services, LMBC II, LLC offers retirement educational services to 401K Plan participants under the name of “Financial Wellness 4 Life.” These services are provided via access to a dedicated website and also through telephonic and email communications with certain professionals, such as CPAs, CFPs, MBAs, AIFs, CFAs, and insurance specialists. Some of these professionals are IARs of CFO4Life, including Mr. McMellian and Mr. Chastain. Additionally, there are times when an IAR or other representative of CFO4Life refers a CFO4Life 401K Plan client to LMBC II, LLC for consideration of obtaining some or all of the non-investment related services provided by such firm, including the retirement educational services offered to 401K Plan participants. The IARs of CFO4Life do not receive any type of compensation for such referrals or for the educational services they provide through Financial Wellness 4 Life. However, Messrs. McMellian and Chastain as owners of LMBC II, LLC receive an indirect benefit since they share in that firm’s profits and losses, which include fees received from LMBC II, LLC clients under the Financial Wellness 4 Life program.

LMBC II, LLC has entered into a loan servicing agreement with Pennsylvania-based Tristate Capital Bank (“Tristate”), whereby Tristate will offer certain types of collateralized loans to LMBC II, LLC clients that have been referred to Tristate by LMBC II, LLC. For each loan obtained by such clients, Tristate will pay a referral fee to LMBC II, LLC. LMBC II, LLC has also entered into a referral agreement with Allegiance Capital Corporation (“Allegiance”). Allegiance is an investment banking firm that will offer mergers and acquisitions investment banking services to LMBC II, LLC clients that have been referred to Allegiance by LMBC II, LLC. For each referred client that enters into an engagement agreement with Allegiance and Allegiance is paid a success fee upon closing of a transaction for that client, Allegiance will pay a referral fee to LMBC II, LLC. There may be times when a LMBC II, LLC client referred to Tristate or Allegiance is also a client of CFO4Life.

In addition, LMBC II, LLC has, and may continue to, enter into referral agreements with certain non-affiliated third party companies, such as insurance brokers and service agencies, whereby LMBC II, LLC will refer potential clients to such companies and receive a fee. There may be times when LMBC II, LLC refers an LMBC II, LLC client to one or more of the companies that also is a client of CFO4Life.

For complete details regarding the time spent, compensation received and potential conflicts with each of the above listed affiliated companies, please refer to ADV Part 2B – Supplemental Brochures for Messrs. McMellian and Chastain. For detailed information regarding the outside business activities of all our IARs, including the compensation received and related conflicts of interest, please refer to their respective Form ADV Part 2B.

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

### **A. Code of Ethics Summary**

CFO4Life has adopted a Code of Ethics (“Code”) which establishes standards of conduct for our supervised persons and includes general requirements that such supervised persons comply with their fiduciary obligations to clients and applicable securities laws, and specific requirements relating to, among other things, personal trading, insider trading, conflicts of interest and confidentiality of client information. It contains written policies reasonably designed to prevent the unlawful use of material non-public information by the Firm or any of our associated persons. The Code also requires that certain of CFO4Life personnel (called “Access Persons”) report their personal securities holdings and transactions and obtain pre- approval of certain investments such as initial public offerings and limited offerings.

The Code also requires supervised persons to report any violations of the Code promptly to CFO4Life’s Chief Compliance Officer (“CCO”). Each supervised person receives a copy of the Code and any amendments to it and must acknowledge in writing having received the materials. Annually, each supervised person must certify that he or she complied with the Code during that year.

CFO4Life will provide a copy of its Code of Ethics to any client or prospective client upon request by contacting us at (214) 637-9500.

### **B. Participation or Interest in Client Transactions**

It is CFO4Life’s policy not to enter into any principal transactions or agency cross transactions on behalf of client accounts. Principal transactions occur where an adviser, acting as principal for its own account, buys securities from or sells securities to any advisory client. Agency cross transactions occur where a person acts as an investment adviser in relation to a transaction in which the adviser, or an affiliate of the adviser, acts as broker for both the advisory client and for another person on the other side of the transaction.

CFO4Life or individuals associated with CFO4Life may buy or sell for their personal account(s) securities or investment products identical to those recommended to or already owned by clients. Alternatively, CFO4Life may cause clients to buy a security in which CFO4Life or such individuals have an ownership position. Such recommendations will only be made to the extent that they are reasonably believed to be in the best interests of the client. Nevertheless, such practices present potential conflicts of interest. To mitigate these conflicts, the Code outlines the procedures regarding personal trading that must be followed (see details below). Additionally, as part of CFO4Life’s fiduciary duty to clients, the Firm and its associated persons will endeavor at all times to put the interests of the clients first and at all times are required to adhere to the Code.

### **C. Personal Trading**

The Firm and its Access Persons may invest personally in securities of the same classes as are purchased for clients and may own securities of the issuers whose securities are subsequently purchased for clients. CFO4Life understands that this could create a conflict of interest, where the Access Person’s interest may be at odds with the interest of our clients. To help mitigate these conflicts of interest, the Code sets forth certain standards of business and professional conduct regarding the personal trading activities of



Access Persons. The following summarizes our procedures for the purchase and/or sales of securities held within personal accounts.

- CFO4Life requires quarterly reporting of all personal securities transactions with the exception of certain exempt transactions and securities (such as government securities, open end mutual funds and money market funds). Access Persons, or those persons with a beneficial interest such as immediate family members, may not buy or sell securities for their personal portfolio(s) where their decision is derived in whole, or in part, by material non-public information.
- Security holdings and financial circumstances of clients must be kept confidential.
- CFO4Life and its Access Persons may not participate in private placements, initial public offerings (IPOs) or certain securities subject to restriction by CFO4Life without pre-clearance from the CCO.
- Records will be maintained of reportable securities bought or sold by Access Persons and will be reviewed periodically by designated Firm personnel.
- Any individual not in observance of the above may be subject to termination.

## **Item 12 – Brokerage Practices**

For discretionary investment management accounts, CFO4Life will determine the broker-dealer to be used and the commission rates at which transactions for client accounts will be effected. When CFO4Life places orders for the execution of portfolio transactions for discretionary client accounts, transactions are allocated to broker-dealers for execution in various markets at prices and commission rates that CFO4Life believes, based upon good faith judgment, will be in the best interest of the client. The following discussion summarizes the material aspects of CFO4Life's practices for the selection of broker-dealers to execute client transactions.

### **A. Selection Criteria**

Currently, CFO4Life participates in the institutional adviser program offered by TD Ameritrade Institutional, a division of TD Ameritrade, Inc. member FINRA/SIPC/NFA ("TD Ameritrade") and an unaffiliated SEC-registered broker-dealer, and recommends that its investment management clients custody their assets with TD Ameritrade. TD Ameritrade provides services which include custody of securities, trade execution, clearance and settlement of transactions. CFO4Life receives some benefits from TD Ameritrade through its participation in the institutional adviser program. As part of its institutional services, TD Ameritrade does not charge custodial fees to a client as long as the account's transactions are placed with TD Ameritrade for execution. TD Ameritrade charges a transaction fee/commission per transaction for each client account. All TD Ameritrade's fees and charges are fully disclosed on the account statements sent by TD Ameritrade to each client. The commissions and/or transaction fees charged by TD Ameritrade may be higher or lower than those charged by other financial institutions.

Factors considered by us in recommending TD Ameritrade as custodian for client accounts are based on, but not limited to, the reasonableness of transaction fees charged by TD Ameritrade, product availability, quality of executions, research and other services available to both the client and us.

While there is no direct link between the investment advice given to clients and our recommendation to use the custodial services of TD Ameritrade, certain benefits are received by CFO4Life due to this arrangement that typically are not available to TD Ameritrade retail investors. Please refer to Item 14A below for a detailed description of the services and benefits received by us.

There may be times, however, when we evaluate and use an alternative broker-dealer for certain individual transactions, if in our discretion we believe that best execution for such individual transactions could be achieved outside of the client's broker custodian.

## **B. Best Execution**

It is the policy and practice of CFO4Life to strive for the best price and execution that are competitive in relation to the value of the transaction ("best execution"). In order to achieve best execution, CFO4Life will use its best judgment to choose the broker-dealer most capable of providing the brokerage services necessary to obtain the best overall qualitative execution. Although CFO4Life will strive to achieve the best execution possible for client securities transactions, this does not require it to solicit competitive bids and CFO4Life does not have an obligation to seek the lowest available commission cost. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the overall best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among other things, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while CFO4Life will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

To ensure that brokerage/custodian firms recommended by CFO4Life are conducting overall acceptable qualitative execution, CFO4Life will periodically (and no less often than annually) evaluate the trading process and broker-dealer(s) utilized. Clients have no obligation to open accounts with any custodial broker-dealers that CFO4Life may recommend.

## **C. Trade Aggregation and Allocation**

Transactions for each client will be effected independently, unless CFO4Life decides to purchase or sell the same securities for several clients at approximately the same time. CFO4Life performs investment management services for various clients, some of which may have similar investment objectives. CFO4Life may aggregate sale and purchase orders with other client accounts and proprietary (employee) accounts that have similar orders being made at the same time, if in our judgment such aggregation is reasonably likely to result in an overall economic benefit to the affected accounts. Such benefits may include better transaction prices and lower trade execution costs. CFO4Life may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among CFO4Life clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. If all aggregate orders do not fill at the same price, transactions will generally be averaged as to price and allocated among participating accounts pro rata to the purchase and sale orders placed for each participating account on any given day. If such orders cannot be fully executed under prevailing market conditions, CFO4Life may allocate the securities traded among participating accounts and each similar order in a manner which it considers equitable, taking into consideration, among other things, the size of the orders placed, the relative cash positions of each account, the investment objectives of the accounts, and liquidity of the security.

## **Item 13 – Review of Accounts**

### **A. Periodic Reviews**

#### *Financial Planning Account Reviews*

Upon completion of the initial financial plan, ongoing annual review services are established.

Generally, we meet with our clients on an annual basis; however, more frequent reviews are not uncommon. The nature of the annual review is to evaluate the client's progress from the previous year based on their goals and objectives. CFO4Life will collaborate with the client to update their financial information (i.e. insurance, investments, assets, income and expenses) and craft their yearly financial planning reports. Financial planning reports are written and may consist of a net worth statement, cash flow statement, estimated tax projections, education analysis, retirement analysis, insurance needs analysis, estate tax calculation, and an investment analysis. Reviews are conducted by an advisor of CFO4Life who is appropriately licensed to provide financial planning services.

#### Investment Management Account Reviews

While investment management accounts are monitored on an ongoing basis, CFO4Life's IARs undertake reviews of client accounts not less than annually. Accounts are reviewed for consistency with the investment strategy and other parameters set forth for the account and to determine if any adjustments need to be made.

### **B. Other Reviews and Triggering Factors**

In addition to the periodic reviews described above, reviews may be triggered by changes in an account holder's personal, tax or financial status. Other events that may trigger a review of an account are material changes in market conditions as well as macroeconomic and company- specific events. Clients are encouraged to notify CFO4Life of any changes in his/her personal financial situation that might affect his/her investment needs, objectives, or time horizon.

### **C. Regular Reports**

Written brokerage statements are generated no less than quarterly and are sent directly from the account custodian. These reports list the account positions, activity in the account over the covered period, and other related information. Clients are also sent confirmations following each brokerage account transaction unless confirmations have been waived.

CFO4Life provides account statements to investment management clients on a quarterly basis. These statements include holdings, transactions and the overall performance of a client's account(s). CFO4Life also provides account performance reports during client meetings.

Clients are urged to carefully review all custodial account statements and compare them to the statements and reports provided by CFO4Life. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Item 14 – Client Referrals and Other Compensation**

### **A. Economic Benefits Received**

As noted in Item 12, CFO4Life participates in the TD Ameritrade institutional program and generally recommends that discretionary clients use TD Ameritrade as their custodian and broker of record. While there is no direct link between the investment advice given to clients and CFO4Life's recommendation to use TD Ameritrade as their custodian, certain benefits are received by CFO4Life, due to this arrangement, that are typically not available to TD Ameritrade 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 advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client

accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to CFO4Life by third party vendors. Many of these services, though not all, may be used to service all or a substantial number of CFO4Life's accounts, including accounts not maintained at TD Ameritrade. These products and services may benefit the Firm but may not benefit our clients' accounts. TD Ameritrade also makes available to CFO4Life other services intended to help us manage and further develop our business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, TD Ameritrade may make available, arrange and/or pay for these types of services rendered to CFO4Life by independent third parties. TD Ameritrade may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to CFO4Life.

The benefits received by CFO4Life through its participation in the TD Ameritrade institutional program do not depend on the amount of brokerage transactions directed to TD Ameritrade. In addition, there is no corresponding commitment made by CFO4Life to TD Ameritrade to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of participation in the program. While as a fiduciary, we endeavor to act in our clients' best interests, our recommendation that clients maintain their assets in accounts at TD Ameritrade may be based in part on the benefit to CFO4Life of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by TD Ameritrade. The receipt of these benefits may create a potential conflict of interest and may indirectly influence CFO4Life's choice of TD Ameritrade for custody and brokerage services.

## **B. Compensation for Client Referrals**

CFO4Life may, from time to time, enter into agreements with individuals and organizations, some of whom may be affiliated or unaffiliated with CFO4Life that refer clients to us. All such agreements will be in writing and comply with the applicable state and federal regulations. If a client is introduced to CFO4Life by a solicitor, CFO4Life may pay that solicitor a fee in accordance with the applicable federal and state securities law requirements. While the specific terms of each agreement may differ, generally, the compensation will be based upon CFO4Life's engagement of new clients and the retention of those clients and would be calculated using a varying percentage of the fees paid to CFO4Life by such clients until the account is closed by written authorization from the client. Any such fee shall be paid solely from CFO4Life's fees, and shall not result in any additional charge to the client.

Each prospective client who is referred to CFO4Life under such an arrangement will receive a copy of this Brochure and a separate written disclosure document disclosing the nature of the relationship between the third party solicitor and CFO4Life and the compensation that will be paid by us to the third party. The solicitor is required to obtain the client's signature acknowledging receipt of this Brochure and the solicitor's written disclosure statement. In any case, applicable state laws may require these persons to become licensed either as representatives of CFO4Life or as an independent investment adviser. CFO4Life will request that our clients acknowledge this arrangement prior to acceptance of the clients' account.

### **C. Sponsorships and Other Benefits Received**

CFO4Life holds various client events during each year, as well as organizes and executes a golf outing the proceeds of which benefit charitable purposes. In staging these events, CFO4Life, or its affiliates, may solicit and receive various sponsorships and other donations from mutual fund advisers, insurance underwriters and other service providers (the “Service Providers”). The Service Providers may have business and service relationships with CFO4Life and/or its affiliates. The contributions may range in amounts from \$350 to \$11,200. Contributors for the 2016 events were as follows: AIG; Alliance Bernstein; American Century; BlackRock; CSG; Deutsche Bank; Fidelity; Goldman Sachs; Hartford Funds; HUB; Ivy Funds; Janus Capital; John Hancock; Lincoln Financial; MVP REIT; MFS Mutual Funds; Nationwide; Oppenheimer; Prudential; TD Ameritrade; Transamerica; and TriState Capital. The receipt of these sponsorships may create a potential conflict of interest and may indirectly influence investment and other related choices made by CFO4Life. Through the execution of its policies and procedures, including such things as execution of its fiduciary duty to clients, account reviews and other policies and processes, CFO4Life works to ensure that investment or other client related decisions are in no way affected, directly or indirectly, by any such received sponsorship dollars.

### **D. Other Compensation**

CFO4Life’s parent company is Focus Financial Partners, LLC (“Focus”). From time to time, Focus holds partnership meetings and other industry and best-practices conferences, which typically include CFO4Life, other Focus firms and external attendees. These meetings are first and foremost intended to provide training or education to personnel of Focus firms, including CFO4Life. However, the meetings do provide sponsorship opportunities for asset managers, asset custodians, vendors and other third party service providers. Sponsorship fees allow these companies to advertise their products and services to Focus firms, including CFO4Life. Although the participation of Focus firm personnel in these meetings is not preconditioned on the achievement of a sales target for any conference sponsor, this practice could nonetheless be deemed a conflict as the marketing and education activities conducted, and the access granted, at such meetings and conferences could cause CFO4Life to focus on those conference sponsors in the course of its duties. Focus attempts to mitigate any such conflict by allocating the sponsorship fees only to defraying the cost of the meeting or future meetings and not as revenue for itself or any affiliate, including CFO4Life. Conference sponsorship fees are not dependent on assets placed with any specific provider or revenue generated by such asset placement.

The following entities have provided conference sponsorship to Focus in the last year:

Fidelity Brokerage Services  
J.P. Morgan Asset Management  
Charles G. Schwab & Co.  
Lord Abbett & Co.

Certain CFO4Life IARs have outside business activities that provide additional compensation. Please refer to Item 10 above for detailed information regarding the business activities, the compensation received, the related conflicts and how CFO4Life mitigates such conflicts.

### **Item 15 – Custody**

Pursuant to Rule 206(4)-2 of the Advisers Act, CFO4Life is deemed to have custody of certain client funds because the Firm has the authority and ability to debit its fees directly from clients’ accounts. To mitigate any potential conflicts of interests, all CFO4Life client account assets will be maintained with an

independent qualified custodian. CFO4Life currently recommends that its investment management clients use TD Ameritrade for custodial services.

CFO4Life may only implement its investment management recommendations after the client has arranged for and furnished CFO4Life with all information and authorization regarding its accounts held at TD Ameritrade or other acceptable qualified custodian.

Clients will receive statements on at least a quarterly basis (generally monthly) directly from TD Ameritrade or other acceptable qualified custodian. Clients are urged to carefully review all custodial account statements and compare them to the statements provided by CFO4Life. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

#### **Item 16 – Investment Discretion**

Clients can determine to engage CFO4Life to provide investment advisory services on a discretionary basis. Prior to CFO4Life assuming discretionary authority over a client's account, the client is required to execute a CFO4Life approved investment advisory agreement granting CFO4Life full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

While we generally allow clients to impose, in writing, reasonable restrictions on the types of securities and/or industries they do not want to be included in their portfolio, each client assumes responsibility for informing CFO4Life in writing of any changes to these restrictions or to their overall investment objectives.

#### **Item 17 – Voting Client Securities**

CFO4Life's policy and practice is to not vote proxies on behalf of its clients and therefore, shall have no obligation or authority to take any action or render any advice with respect to the voting of proxies solicited by or with respect to issuers of securities held in a client's account. Consequently, the client retains the responsibility for receiving and voting all proxies for securities held within the client's account. CFO4Life shall not be deemed to have proxy voting authority solely as a result of providing advice or information about a particular proxy vote to a client.

CFO4Life typically does not advise or act for clients with respect to any legal matters, including bankruptcies and class actions, for the securities held in clients' accounts.

#### **Item 18 – Financial Information**

CFO4Life does not have any financial impairment that will preclude it from meeting contractual commitments to clients. A balance sheet is not required to be provided as CFO4Life does not both (i) serve as custodian for client funds or securities and (ii) require prepayment of fees six months or more in advance.

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