



EMBER L. FLACK, JD, CFP[®], CLU, ChFC
Wealth Planning & Management

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This brochure dated March 31, 2020 has not been approved by the Securities and Exchange Commission or any state securities authority.

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ADVISORY BUSINESS

Ember L. Flack, JD, CFP®, CLU, ChFC (“Adviser”) is an independent Investment Adviser, distinguished by the highest levels of professional certification in the financial planning field. Ms. Flack is a Certified Financial Planner® practitioner. Additionally, Ms. Flack is among less than 3% of all Certified Financial Planner® practitioners in the United States who hold a Juris Doctorate. Moreover, she is certified by the Board of Trustees of The American College as a Chartered Life Underwriter® and Chartered Financial Consultant®. Ms. Flack provides comprehensive financial planning and investment management to Clients who seek progressive leadership from a neutral adviser. She has advised executives, professionals and retirees throughout the United States since 1990, and her practice manages Client accounts totaling more than \$190 million as of December 31, 2019.

Advisory services include financial planning consultation and analyses aimed at addressing the objectives and anticipated needs expressed by the Client. Asset values, analyses and recommendations are based on the facts disclosed by the Client about his or her current situation. Elements of individual Financial Plans and Financial Plan Updates may include a net worth statement, cash flow evaluation, education funding analyses, retirement planning alternatives, investment policy analyses, life insurance needs assessments, disability income protection strategies, long term care risk evaluation, and creation of an Action Plan, or any combination of these elements. Other advisory services may include estate plan evaluation, asset protection analyses, qualified retirement plan evaluation, executive benefit analyses, retirement income distribution strategies, and Required Minimum Distribution analyses for tax deferred investments.

By separate agreement, advisory services may also include investment management consultation where the Client selects investment solutions with the Adviser’s assistance that the Client believes suit his or her financial circumstances, investment objectives, and Adviser’s financial planning recommendations. Adviser currently offers investment solutions through SEI Investments, an active, global investment manager delivering broadly diversified and uniquely constructed asset allocation strategies. While Adviser may also recommend investment solutions beyond SEI’s proprietary mutual funds, in most cases Adviser prefers SEI mutual fund solutions for its Clients because SEI’s research-based investment philosophy is founded on principles that are well aligned with Adviser’s investment philosophy. Adviser directs the Client’s investment custodian to allocate the Client’s portfolio(s) in accordance with the asset allocation/Investment Policy Statement that the Client adopts. Generally, Clients may not impose restrictions on investing in certain securities or types of securities. By separate agreement between Client and custodian, the Client directs the custodian to rebalance the portfolio at least quarterly to ensure that the custodian’s implementation conforms to parameters set forth in the Investment Policy Statement agreed upon by Client and Adviser.

FEES AND COMPENSATION

Adviser is compensated for Advisory Services by fees, and not by commissions arising from the sale of investment products. Fees are not negotiable, and are applied uniformly to all Clients. Fees for financial planning consultation and analyses depend on the complexity of a Client's situation and scope of services provided. Fixed fees for Financial Plan analyses and Financial Plan Updates range from \$950 to \$10,000, plus any out-of-the-ordinary reimbursable expenses (such as travel costs, fees for professional advisers such as attorneys or CPAs, etc.). Fixed fees shall be paid by check upon execution of the Client Advisory Agreement, but are never required to be paid six months or more advance. When Adviser is engaged on a fixed fee arrangement, Clients may expect that all consultations reasonably related to development of the Financial Plan and Financial Plan Update will be included in the scope of work. On the other hand, an hourly fee of \$250 per hour, plus reimbursable expenses, may be agreed upon for special situations involving highly complex estates or financial issues requiring advanced calculations. Hourly fees shall be invoiced monthly in arrears, offset by any deposit paid to Adviser upon execution of the Client Advisory Agreement. Hourly fees may be in addition to, or in lieu of fixed fees, as agreed upon by the Adviser and Client.

The Adviser or Client may terminate the Client Advisory Agreement at any time by providing written notice to the other party. If at the point of termination, Adviser has not delivered the Financial Plan or Financial Plan Update report to the Client, a portion of the fee paid upon execution of the Client Advisory Agreement shall be refunded to the Client within thirty (30) days of termination notice. Such refund shall be calculated as the resulting difference between the fee(s) paid to date, minus an hourly rate of two hundred fifty dollars (\$250) times the number of hours, full and fractional, the Adviser has invested in the case analysis and consultation during the period beginning with data gathering and ending upon Adviser's receipt of termination notice.

Investment management fees are based on the volume of assets under Adviser's management. Adviser does not provide any brokerage services, and does not receive any compensation relating to managing a Client's investments other than its investment management fees. Investment management fees are calculated based on the asset value of the Client's account at the end of each quarter-year and are paid quarterly in arrears. Investment management annual fees are as follows: 1.40% for an account size up to \$250,000, 1.05% for the next \$250,000, .70% for the next \$500,000, .60% for the next \$1 million, and .50% for that portion of an account over \$2 million. Investment management fees are not negotiable. Clients pay investment management fees to Adviser. By separate agreement between the Client and custodian, Clients authorize custodian to deduct Adviser's investment management fees from the Client's account(s) and to remit the same to Adviser. Client's custodian shall provide written notice no later than the time of the fee deduction, detailing the amount of the fee, method of calculation and amount of assets upon which the fee is based. The Adviser or Client may terminate the Investment Management Agreement at any time by providing written notice to the other party. Adviser's final investment management fee will be calculated on a pro-rata basis based on the number of days the account was under Adviser's management responsibility during the final quarter-year of the engagement. Additionally, each mutual fund in a Client's account pays its own advisory fees and other expenses which are set forth in each mutual fund's prospectus. The mutual fund fees and expenses are separate charges from Adviser's investment management fees and are paid to the mutual fund, and not to Adviser. Mutual fund fees are established by the fund's Board of Directors and are subject to change from time to time. There may also be custody fees or other charges imposed by the custodian for certain transactions.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Adviser does not charge performance-based fees.

TYPES OF CLIENTS

Ms. Flack's impressive credentials and depth of experience attract a broad range of Clients, representing nearly 90 households throughout the United States, and more than \$190 million of assets under management as of December 31, 2019. Her practice is well suited to serving high-net worth, individual Clients. Individuals or couples with a net worth of at least \$500,000 are positioned well to capture the best value from Ms. Flack's services and skills. However, Ms. Flack does not define a fixed minimum net worth to consider an engagement, and establishes investment accounts as small as \$100,000.

Her Clients range in age from early 40s through early 90s, with a full complement of goals, needs, and limitations. Clients who are still in the workforce are often well-along in their careers, having already progressed with basic financial accomplishments that focus on accumulation and managing financial risk. These middle-aged Clients engage Ms. Flack to identify specific action steps to propel their financial success to the next level, typically focusing on retirement and education funding, investment strategy, and managing the risk of premature death, disability, and long term care expense. Additionally, a significant portion of Ms. Flack's Clientele is retired, enjoying the distribution phase of the investment cycle. These older Clients seek to manage their investment estate wisely, understand appropriate withdrawal boundaries, and to manage more complex risks of retirement. Planning for the successful transfer of wealth to future generations is often a common planning objective Ms. Flack's older Clients, and well within her skill set.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

When a Financial Plan or Financial Plan Update is developed, Adviser identifies the Client's required investment return range, taking into account the Client's appetite for risk, timetable, ability to add additional savings to an account, expectation of future liquidity events (such as sale of real estate or sale of a small business). For each account that Client establishes, an Investment Policy Strategy is adopted by the Client and Adviser. The Investment Policy Strategy details the Client's investment objective, guidelines for time horizon, risk tolerance, asset allocation and rebalancing parameters. Recognizing that asset allocation is a primary driver of performance variability, emphasis is placed on diversifying between both developed and emerging markets in both the equity and fixed income asset classes. Moreover, to further manage risk, Adviser seeks to identify a spectrum of complementary management styles within each asset class. After reviewing prospectuses carefully, the Client selects a portfolio of SEI mutual fund solutions with the Adviser's assistance that the Client believes suit his or her financial circumstances, investment objectives, and Adviser's financial planning recommendations. Adviser directs the investment custodian to allocate the Client's portfolio(s) in accordance with the Investment Policy Statement that the Client adopts. By separate agreement between Client and custodian, the Client directs the custodian to rebalance the portfolio at least quarterly to ensure that the custodian's implementation conforms to parameters set forth in the Investment Policy Statement agreed upon by Client and Adviser. By way of periodic checkpoints, and more formally by annual review, this analysis-investment policy development-implementation cycle is repeated.

Risk management and tax control are central to Investment Policy Strategy development. Accounts are actively managed in a manner consistent with the Investment Policy Strategy, but frequent trading is discouraged. Account objectives cannot be achieved without incurring a certain amount of principal volatility. Each account is managed in a style-neutral manner that seeks to minimize principal fluctuations over the established time horizon and that is consistent with the Client's stated objectives. No guarantees can be given about future performance. Although every effort is made to diversify each Investment Policy Strategy across a broad spectrum of asset classes, and further manage risk of loss within each asset class by utilizing an array of complementary management styles, it is possible that certain risks are borne by Clients who limit their investment implementation to SEI proprietary mutual funds only. Upon request, non-SEI mutual funds, or other publicly traded securities, may be incorporated into any account. In addition to the normal risks associated with investing, international investments may involve risk of capital loss from unfavorable fluctuation in currency values, from differences in generally accepted accounting principles or from economic or political instability in other nations. Emerging markets involve heightened risks related to the same factors, in addition to those associated with their relatively small size and lesser liquidity. Bonds and bond funds will decrease in value as interest rates rise.

DISCIPLINARY INFORMATION OF ADVISOR FIRM

Adviser and advisory affiliates have never been the subject of any complaint, legal action, or disciplinary event in connection with Adviser's practice, or in connection with any outside business activities.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Ms. Flack is a licensed life and health insurance agent and holds contracts with various insurance companies. Clients may be invited to implement insurance recommendations through Ms. Flack, but they are never obligated to do so. However, Clients are advised that Ms. Flack would be paid a commission by the insurance company for a life, disability, or long term care insurance policy, or annuity purchased by the Client through Ms. Flack, should they elect to do so. Accordingly, although Clients place very high trust in Ms. Flack, Clients must carefully consider the opportunity for Ms. Flack's conflict of interest when she serves as both their investment adviser and the insurance agent.

Additionally, Ms. Flack is an attorney and is licensed to practice law in Texas, New York and before the United States Supreme Court. Advisory services do not include legal advice. Adviser recommends Client consult his or her attorney or tax adviser concerning these matters.

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

Code of Ethics

Clients engage Adviser because of special skills, and above all, trustworthiness. A consequent obligation of Adviser is to maintain the highest standards of ethical conduct. In all professional functions, all of Adviser's actions shall pursue Client's interests within the bounds of the law generally, as well as Federal securities laws, the Investment Advisers Act of 1940 and Investment Advisers Act Rules specifically. In doing so, Adviser should be competent, prompt and diligent. Adviser should maintain communication with a Client concerning the engagement. Adviser should keep in confidence information relating to

engagement of a Client except so far as disclosure is required or permitted by the client or by law. In carrying out its fiduciary responsibilities, Adviser shall conduct all professional functions with the utmost care, good faith, and fair dealing consistent with serving its Clients' best interests.

Additionally, as a CFP® practitioner, Ember L. Flack (and any employee who is a CFP® practitioner) is held to the *Standards of Professional Conduct* as promulgated by the CFP® Board of Standards. The CFP® Board is a certifying and standards-setting body for those individuals who have met and continue to meet CFP® Board's initial and ongoing certification requirements. The CFP® Board adopted its *Code of Ethics* to establish the highest principles and standards for CFP® professionals. These *Principles* are general statements expressing the ethical and professional ideals CFP® certificants are expected to display in their professional activities. As such, the *Principles* are aspirational in character and provide a source of guidance for certificants. The *Principles* form the basis of CFP® Board's *Rules of Conduct*, *Practice Standards* and *Disciplinary Rules*, and these documents together reflect CFP® Board's recognition of certificants' responsibilities to the public, Clients, colleagues and employers. The *Rules of Conduct* establish the high standards expected of certificants and describe the level of professionalism required of certificants.

Participation or Interest in Client Transactions

Adviser does not recommend to Clients, nor buy nor sell for Client accounts, any securities in which the Adviser or a related person has a material financial interest.

Personal Trading

Adviser does invest in many of the same unaffiliated, publicly traded mutual funds that are selected by Clients for their investment accounts. However, Adviser does not trade securities for any Client accounts, nor recommend any specific security for Clients' investments. Adviser does not control the timing of any sale or purchase of any individual security in any account, including Ms. Flack's personal accounts. Adviser's Code of Ethics requires that access persons shall report their personal securities transactions and holdings periodically to Adviser's Chief Compliance Officer for review.

BROKERAGE PRACTICES

Adviser recommends institutional broker dealers for Client transactions that are affiliated with the no-load mutual fund solutions selected by Clients for their accounts. Criteria for recommended broker dealers are cost, quality assurance protocols, recordkeeping procedures, disaster recovery protocols, and service models. In the rare occasion that it is necessary for the Client's custodian to facilitate the trade of individual securities (such as accommodating a sale requested by a client of stock owned prior to engaging Adviser as necessary to populate the recommended Investment Policy adopted by the Client), such transactions are accommodated by the selected institutional broker dealer at a fractional cost to Clients compared with retail brokerage firms. Adviser never participates in any compensation relating to any transaction in any Client account. However, Adviser may utilize communications made available by certain broker dealers or their affiliates in reference to market conditions, economic perspective, and educational commentaries on topics such as oil prices, gold, commodities, impact of natural disasters, inflation, socio-political influences on market and economic conditions, etc., and Adviser occasionally makes such communications available to Clients in supplement to Adviser's ongoing consultation.

Client Referrals

Adviser does not receive referrals from any broker dealer or solicitor. All referrals to Adviser's practice originate from existing Client relationships, personal and business contacts, friends and family.

Directed Brokerage

Adviser does not engage in directed brokerage.

Trade Aggregation

Adviser recommends institutional broker dealers for Client transactions that are affiliated with the no-load mutual fund solutions implemented by Clients in their accounts. Since Adviser is not responsible for executing trades in any Client account, Adviser does not aggregate trades for Clients. All trade execution is accomplished via the Client's chosen broker dealer.

REVIEW OF ACCOUNTS

At least once annually, Adviser will contact each Client to discuss whether the investment account(s) continues to reflect Client's investment objectives and financial requirements. However, Client is responsible for ensuring that Adviser is made aware of changes affecting suitability, and Client must promptly inform Adviser in writing of any changes. Adviser reviews Investment Policy Statements adopted by each Client for each account to reaffirm suitability of recommended asset allocation based on financial circumstances and investment objectives most recently disclosed by Client to Adviser. All account reviews are performed by Ms. Flack. Investment accounts may be reviewed more frequently than annually upon request.

The Client's custodian directly provides Client and Adviser with monthly account activity statements for all investment accounts managed by Adviser, including quarterly performance data on all accounts, and an annual tax report in tandem with IRS Forms 1099 as appropriate. In Financial Plan and Financial Plan Update reports, Adviser relies on value and performance information supplied by the custodian for all investment accounts managed by Adviser that are incorporated into such reports. It is recommended that Clients review statements provided to them by the custodian to compare values with those listed in Financial Plan and Financial Plan Update reports prepared by Adviser.

CLIENT REFERRALS AND OTHER COMPENSATION

Adviser does not compensate others for Client referrals. Adviser does not receive any economic benefit or any form of compensation from a person who is not a Client for providing advisory services to Clients.

CUSTODY

Adviser shall never act as a custodian for any Client's funds or securities, and shall not hold, directly or indirectly, Client funds or securities. Adviser shall never have any authority to obtain possession of Client funds or securities. The custody of all funds and securities in a Client's account will be maintained by the qualified custodian, SEI Private Trust Co. The relationship between Client and custodian will be

governed solely by a separate agreement that Client executes with such custodian. Pursuant to such custodial agreement, custodian may charge a separate custody fee for the custody service it provides to Client. Client will be solely responsible for paying all custody fees or other charges of custodian.

Client shall never deliver to adviser stock certificates or cash. Rather, all securities, cash, and all deposits made to an account shall be delivered by the Client directly to the custodian. Any inadvertent receipt by the Adviser of Client funds or securities shall be returned to the sender within three business days of receipt.

Adviser shall not have authority to withdraw funds or securities from a Client's account under any circumstances. Accordingly, adviser is never authorized to deduct advisory fees or other expenses from a Client's account. An adviser shall not have power of attorney over any Client funds, or to dispose of Client funds or securities for any purpose.

Account statements and values will be provided to Clients and Adviser directly by the custodian, and not through Adviser. In Financial Plan and Financial Plan Update reports, Adviser relies on value and performance information supplied by the custodian for all investment accounts managed by Adviser that are incorporated into such reports. It is recommended that Clients review statements provided to them by the custodian to compare values with those listed in Financial Plan and Financial Plan Update reports prepared by Adviser. Comparing statements will also allow Clients to confirm account transactions, including deductions by custodian to remit investment management fees to Advise.

Adviser has determined it is operationally independent from custodian, SEI Private Trust Co., and does not act as an adviser to a pooled investment vehicle. Accordingly, an independent public accountant does not conduct an annual surprise examination of assets, or prepare an internal control report with respect to Adviser.

INVESTMENT DISCRETION

Adviser does not accept discretionary authority in any Client's investment account.

VOTING CLIENT SECURITIES

Adviser does not accept authority to vote any proxies relating to securities held in any Client's account, and shall also not give any advice about how to vote such proxies. Clients receive proxies and other solicitations directly from the issuer of the securities in which they invest by US Mail, or upon request, by electronic means.

FINANCIAL INFORMATION

Advisory fees are never required to be paid 6 months or more in advance. Therefore, disclosure of Adviser's financial information is not required disclosure.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE OF ADVISORY PERSONNEL

Ember L. Flack was born in 1965 and grew up in her home state of New York. She holds a Bachelor of Arts degree from the University of North Texas where she was recognized as a Presidential Scholar, and

she also earned a Master of Science degree from Texas Woman's University. She has been the Principal of her financial planning practice since January, 1990, also serving as its Chief Compliance Officer. Additionally, Ms. Flack earned a Doctor of Jurisprudence from Texas Wesleyan University School of Law, is a member of the Texas Bar, the New York Bar, and is also licensed to practice law before the United States Supreme Court.

Ms. Flack has earned the highest levels of professional certification in the financial services industry. She is certified by the CFP® Board of Standards as a Certified Financial Planner® (CFP®) practitioner. In addition to meeting certain post-baccalaureate education and financial services industry experience, CFP® certificate candidates must master nearly 100 integrated financial planning topics, including general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Additionally, CFP® certificate candidates must pass a 2-day, 10 hour comprehensive examination demonstrating proficiency in all practice areas. CFP® licensees must also perform continuing education requirements, including ethics training, on an ongoing basis to remain in good standing.

Additionally, Ms. Flack is certified by the Board of Trustees of The American College as a Chartered Life Underwriter® and Chartered Financial Consultant®. The Chartered Life Underwriter® (CLU®) is the most respected designation of insurance expertise. CLU® designates are recognized as possessing in-depth knowledge on the insurance needs of individuals, business owners and professional Clients. The Chartered Financial Consultant® (ChFC®) is prepared to meet the most advanced financial planning needs of individuals, professionals and small business owners, possessing in-depth knowledge of key financial planning disciplines. In addition to possessing sufficient work experience in the financial services field, CLU® and ChFC® candidates are required to complete educational coursework as prerequisites to written examination on topics such as insurance planning, insurance law, fundamentals of estate planning, planning for business owners and professionals, financial planning, health insurance, group benefits, planning for retirement needs, and investments. Continuing education and ethics training are required of all CLU® and ChFC® designates.

Moreover, Ms. Flack has practiced law since May, 1998. Her law practice, Ember L. Flack, PLLC, focuses on wills, trusts, estate planning and probate. While advisory services do not include legal advice, Ms. Flack's legal skills have enhanced her value to financial planning clients, as her qualifications enable Ms. Flack to discover financial issues and planning opportunities that go far beyond what may be apparent to financial planning practitioners who lack the legal training and experience of law practice that she possesses.

DISCIPLINARY INFORMATION OF ADVISORY PERSONNEL

Adviser has never been the subject of any complaint, legal action, or disciplinary event in connection with Adviser's practice, or in connection with any outside business activities.

OTHER BUSINESS ACTIVITIES OF ADVISORY PERSONNEL

Ms. Flack is a licensed life and health insurance agent and holds contracts with various insurance companies. Clients may be invited to implement insurance recommendations through Ms. Flack, but they are never obligated to do so. However, Clients are advised that Ms. Flack would be paid a commission by the insurance company for a life, disability, or long term care insurance policy, or annuity

purchased by the Client through Ms. Flack should they elect to do so. Accordingly, although Clients place very high trust in Ms. Flack, Clients must carefully consider the opportunity for Ms. Flack's conflict of interest when she serves as both their investment adviser and the insurance agent.

Additionally, Ms. Flack is an attorney and is licensed to practice law in Texas, New York and before the United States Supreme Court. Advisory services do not include legal advice. Adviser recommends Client consult his or her attorney or tax adviser concerning these matters.

ADDITIONAL COMPENSATION OF ADVISORY PERSONNEL

Adviser does not receive any additional compensation other than what is described above in this brochure.

SUPERVISION OF ADVISORY PERSONNEL

Adviser does not employ any advisory personnel. All advisory services are performed by Ember L. Flack.

PRIVACY POLICY

Adviser is committed to safeguarding the confidential information of its clients. Adviser holds all clients' personal information in the strictest confidence. This includes all personal information that Adviser collects from clients in connection with any of the services provided pursuant to the Client Advisory Agreement and Investment Management Agreement. Adviser does not disclose information to nonaffiliated third parties, except as permitted by law or regulatory authority, without a client's consent. Federal and state regulators may also review firm records as permitted by law.

The categories of nonpublic personal information that Adviser collects from a client depend upon the scope of advisory services provided. Such information will include information about a client's personal finances, information about a client's health to the extent that it is needed for the financial planning process, review of tax documents, employee benefits, trusts and estate planning instruments.

Adviser maintains a secure office and computer environment to ensure that a client's information is not placed at unreasonable risk. Adviser maintains all clients' personal information records at least five (5) years. Adviser does not provide any client information of any kind to mailing list vendors or solicitors for any purpose.

Adviser does communicate with clients and third parties via electronic mail ("email"). Adviser utilizes various methods to safeguard outgoing email communications that may contain sensitive or other nonpublic personal information. All email stored within Adviser's computer systems remains encrypted. However, it is the Client's responsibility to safeguard any sensitive or nonpublic personal information that Client transmits via email to Adviser. Clients may request an encrypted email portal from Adviser at any time for this purpose.

Adviser does make use of broadcast email communications to groups that may include clients. Such information disseminated is educational in nature, relates to public information concerning market conditions and general financial planning concepts, and never includes personal or confidential client information.

If a client terminates an engagement with Adviser, or does not opt to renew the Client Advisory Agreement, Adviser will continue to follow the privacy practices described in this notice with respect to such individual.