

**Item 1 – Cover Page**



**MERIT FINANCIAL PARTNERS, LLC**  
*With You Every Step of the Way* *An Independent Company*

A Connecticut and New York Registered Investment Advisor

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**Form ADV Part 2**  
**Advisory Brochure**  
**January 27, 2020**

This brochure provides clients and prospective clients with information about Merit Financial Partners and the qualifications, business practices, and nature of its services that should be carefully considered before becoming an advisory client. Questions relative to the firm, its services, or this ADV Part 2 may be made to the attention of Mr. Michael Terry at (718) 898-0871.

The contents of this brochure have not been approved or verified by the U.S. Securities and Exchange Commission (SEC) or any other state or federal governmental authority. While the firm and its associates may be registered with the States of Connecticut, New York or other jurisdictions, it does not imply a certain level of skill or training on the part of the firm or its associated personnel.

Additional information about the firm, other advisory firms, or associated investment advisor representatives is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Material Changes**

The firm has amended its Form ADV Part 2 from the previous version dated February 20, 2019 as part of its annual updating amendment filing. The firm's regulatory assets under management as of the end of its previous fiscal year are disclosed in Item 4.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's Website: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or you may contact our firm at (718) 898-0871.

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**Important Note:** Throughout this document, Merit Financial Partners, LLC may be referred to by the following terms: “Merit Financial Partners,” “the firm,” “we,” “us,” or “our.” The client or prospective client may be also referred to as: “you,” “your,” etc., and refers to a client engagement involving a single *person* as well as two or more *persons*. The term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary (i.e., Internet address, etc.).

**This brochure consists of 33 pages including the incorporated ADV Part 2B Brochure Supplements and is not complete without all pages.**

## **Item 4 - Advisory Business**

### **About Our Firm**

Today, more than ever, consumers need trusted advice they can count on. An unpredictable economy and so many financial choices can be overwhelming - almost to the point of inaction. Now...you have an advocate. Someone who is on your side and who understands what you need. Because we work by the hour or within a customized package, we can give you the financial advice you seek – free from sales pressure!

Merit Financial Partners provides fee-only financial planning and investment consultation services for individuals, trusts, estates, and other business entities. “Fee-only” means that we do not sell any financial products; we sell only our advice and services. This is different from other “advisors” in that we do not receive any commissions or referral fees, nor do we offer percentage-of-asset fees for new engagements.

We hold ourselves to a *fiduciary standard*, which means our firm and its associates will act in the utmost good faith and perform in a manner believed to be in the best interest of our clients. As investment advisors we are required to put you -- the client -- first. We feel this sets us apart from other firms that may be held to a, perhaps lesser, *suitability* standard and may not be required under current regulation to disclose their conflicts of interest involving their clients’ (or their own) transactions.

Merit Financial Partners, LLC is a New York based firm registered as an investment advisor with the Securities and Exchange Commission (SEC). The Firm was the result of the merger of MTP Advisors (established in 2006) and Cox Financial Services (established 2009). Mr. Michael Terry (see Item 19) and Ms. Elizabeth Cox are co-owners of Merit Financial Partners, LLC. Mr. Terry is Chief Compliance Officer.

Our service offerings are wide-range to meet clients’ needs. Approximately half of our firm's advisory activities involve continuous supervision and management of our clients' assets. When combined with financial planning, we describe this service as *wealth management*. As of December 31, 2019, the firm had approximately \$119.5 million account assets under its management.<sup>1</sup> The remaining 50% of our services is oriented toward *financial planning services* involving expense budgeting and savings; education, insurance, retirement and tax planning, divorce financial analysis, college financial aid planning and other planning services.

### **Our Services**

Merit Financial Partners conducts an introductory interview with each prospective client; we call this our “Initial Consultation.” During our Initial Consultation, we discuss your goals and current financial situation, our background and services, whether our services could provide you with a plan to meet your goals, and the cost of these services. This meeting will also provide you with an opportunity to ask any questions you may have of us.

During or prior to the Initial Consultation, we provide each prospective client with a current ADV Part 2 Brochure (the document you’re reading now) as well as our Privacy Policy. Should you wish to engage MFP for our services, you (the client) and we (the firm) must enter into a written agreement. Once we have signed an agreement, we will obtain additional information from you or from anyone else you tell us is legally acceptable (e.g., another advisor, legal counsel, etc.). We may request this information through further discussions, financial statements and documents, questionnaires, etc. This information will help us to understand your financial need, goals, holdings, etc.

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<sup>1</sup>The term “assets under management” and rounding to the nearest \$100,000 are as defined by the SEC’s 2010 *General Instructions for Part 2 of Form ADV*.

Our financial advice and/or financial plans are based upon the information disclosed by you or your legal agent, and reflect your financial situation at the time the plan is presented.

### **Financial Planning Services**

The firm provides financial planning and investment consultation services, which may be either broad based or more narrowly focused, depending on your needs and wishes. Advice is rendered in the areas of cash flow and debt management, college funding, retirement planning, retirement benefits planning, estate planning, income real estate planning, tax planning, asset allocation and investment selection, property and casualty insurance, life and disability insurance, health insurance and long term care insurance, and other specific needs as indicated by the client.

If you request that we focus our financial planning and investment consultation services only on certain areas, please understand that your overall financial situation or needs may not be fully addressed due to the limitations you have established.

We require financial planning clients to furnish certain records and documents for our review, which may include:

- tax returns
- current financial specifics including W2s or 1099s
- information on current retirement plans and insurance provided by the client's employer
- mortgage information
- insurance policies
- statements reflecting current investments in your retirement and non-retirement accounts
- copies of wills and trusts
- other pertinent documents

Once we have received these documents we will review them in detail and make recommendations based on your current situation, expectations, objectives and time horizon. At the same time, your risk tolerance – which is your ability to live comfortably with risk in association with investing - will be taken into account. Much of this information will be determined during an initial interview.

Following our review, we will prepare analyses of your current financial situation and possible future scenarios, when appropriate. We will then present our analysis and a written summary of the significant observations, assumptions and recommendations in each area we were engaged to provide advice. For more broad-based planning, your engagement may include investment consultation services as described in the following paragraph.

You will retain full discretion over all implementation decisions and are free to accept or reject any recommendation we make. Further, it remains your responsibility to promptly notify us if there is any change in your financial situation or investment objectives for the purpose of our reviewing, evaluating, or revising previous recommendations and/or services.

### **Investment Consultation Services**

Our investment consultation services may involve providing information on the types of investment vehicles available; investment analysis and strategies, asset selection, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian of your choosing.

## **Financial Planning and Investment Consultation Packages**

MERIT FINANCIAL PARTNERS, LLC offers several packages designed to meet some of the more common needs and objectives our clients may have. These packages are as follows:

### **Comprehensive Financial Plan:**

A look at multiple aspects of your financial health: cash flow/saving assessment, debt management, investment planning, college planning, income tax planning, real estate assessment including income property, insurance planning, estate planning, & retirement planning.

With a comprehensive financial plan you will feel more confident about your financial decision-making, save more money and feel better about your progress in saving toward financial goals. This package benefits people at all income levels and at any stage of their lives.

### **Retirement Roadmap:**

In this process we determine the retirement income goals and the actions and decisions necessary to achieve those goals. This includes identifying sources of income, estimating expenses, implementing a savings program and managing assets. Future cash flows are estimated to determine if the retirement income goal will be achieved.

Do you want to know what you need to do to retire when you want, how you want? Our retirement planning process is for those planning to retire within 5-15 years. This option provides an in-depth review of your current financial standing and your retirement objectives. The process includes: current net worth statement, current and long-term cash flow projections, review of your current investment portfolio, and retirement capital needs analysis.

### **The Bottom Line Planning Package:**

This package includes a two-hour collaborative working session augmented by additional behind-the-scenes preparation, analysis, and documentation, culminating in the delivery of a limited-scope financial action plan. The total advisory time included in this option is three hours.

Your key questions and concerns are addressed in time- and cost-efficient manner. These questions might include the following: Budgeting, Debt Repayment and Refinancing, Savings Plans, Financial Goal Setting, Retirement Resource Evaluation, Insurance Needs Analysis, Portfolio Diversification and Investment Selection, Tax Planning and Tax Efficient Investment Strategies, Retirement Plan Decisions, and Inheritance proceeds Decisions.

### **Second Opinion Package:**

This package provides a thorough analysis of your Asset Allocation, short- and long-term objectives and risk review.

It is designed both for those looking to evaluate the advice of their current investment advisors, as well as those interested in a third-party evaluation for their unadvised portfolios.

### **Tax Planning Package:**

You may choose to engage our firm by combining financial planning and tax planning services. If you choose this combination, we can make portfolio allocation recommendations and financial planning strategies with a goal of minimizing income tax obligations.

This package is especially beneficial to those in high income tax brackets and/or those who have unrealized taxable gains in their portfolios.

### **College Financial Planning Package**

College Planning and Financial Aid is fast becoming the largest drain on finances for families as they approach retirement. Our planning packages can help parents start saving for this enormous expense. For parents with children close to college our Comprehensive College Financial Planning Package will step the family through the process starting with how to choose the right college to maximizing financial aid and completing the process right through application, FAFSA and CSS Profile applications and even the appeal process.

### **Ongoing Retainer Services**

After we have completed a financial plan together, you have the option to continue with Merit Financial Partners on an ongoing basis. Fees for these services are charged on a monthly basis as described in Item 5 – Fees and Compensation.

#### **Premium Ongoing Advisory Service includes:**

- Full annual update of financial plan with presentation meeting
- Optional mid-year plan update via videoconference, phone call, or a meeting
- Financial advice on an ad hoc basis via phone calls and emails
- Help when you need it, whether it's buying a car or refinancing your mortgage. You can contact us whenever you have a question related to your personal finances. No extra charge!
- Quarterly investment/market newsletter
- Access to a client portal where all of your scanned documents and reports we have delivered to you remain safely accessible to you

#### **Ongoing Advisory Service includes:**

- Financial advice on an ad hoc basis via phone calls and emails
- Help when you need it, whether it's buying a car or refinancing your mortgage. You can contact us whenever you have a question related to your personal finances. No extra charge!
- An annual review meeting to update your financial plan and review your asset allocation
- Quarterly investment/market newsletter

### **Other Services**

#### **Divorce Financial Analysis and Planning Services**

Our firm may be engaged to provide financial analysis and planning in matters involving divorce. Such services are for our client and their selected attorney. At no time is this engagement to be considered providing legal advice involving the matter of marital dissolution, and clients are encouraged to obtain legal and accounting services from an accredited professional source to review our work product and/or implement our recommendations.

#### **Investment Management Services**

You may also choose to engage our firm to implement the investment strategies we have recommended. Your portfolio is constructed in accordance with the goals identified during your financial planning process and relies upon an asset allocation strategy designed with those goals in mind. Holdings allocated in the investment

portfolio are managed with a minimum investment horizon of three years. If your funds are required within a shorter time frame, they will be invested in accordance with your “drawdown horizon.”

We employ active or passive investment strategies deemed appropriate for the individual investor, which are described in further detail in Item 8 of this brochure. We provide these services under an investment advisory agreement (defined in Item 16).

Portfolio goals may range from current income with capital preservation to long-term growth and those offered by our firm are believed to be well diversified to minimize sector, industry, and other market risks. Stocks, bonds, mutual funds, index funds, closed-end funds, and other publicly traded securities may be used to achieve this mix.

Whenever practical, we will assist in preparing an investment policy statement (IPS), or similar document, reflecting our client's investment objectives, time horizon, risk tolerance, as well as policy or investment constraints. The IPS will be designed to be specific enough to provide ongoing guidance while concurrently allowing flexibility to respond to changing market conditions. Since the IPS will to a large extent be a product of information and data provided by our clients, they will be responsible for review and final approval of the statement.

#### General Information

We do not sponsor or serve as portfolio manager for a wrap fee investment program, nor do we provide legal or accounting services. With your consent, we may work with your attorney or accountant to assist with the coordination and implementation of accepted strategies. You should be aware that these advisors may bill you separately for services and these fees will be in addition to those of our firm.

Our firm will use its best judgment and good faith effort in rendering its services. MERIT FINANCIAL PARTNERS, LLC cannot warrant or guarantee any particular level of account performance, or that account will be profitable over time. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, our firm will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by our firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from our adherence to your direction or that of your legal agent; or any act or failure to act by a service provider maintaining an account.

Notwithstanding the preceding statement, nothing within our client agreement is intended to diminish in any way our fiduciary obligation to act in your best interest or in any way limit or waive your rights under federal or state securities laws or the rules promulgated pursuant to those laws.



## **Item 5 - Fees and Compensation<sup>2</sup>**

### **Hourly Fees**

#### **Financial Planning Fees**

**Hourly Fee** – We provide our financial planning services under an hourly engagement. Prior to entering into this agreement you will receive an estimate of the fee range. Our hourly financial planning fees are \$275 per hour. You are billed for the actual time spent by our firm; assessed in 10 minute increments, and a partial increment will be treated as a whole.

Our firm may require a deposit for hourly engagements in the amount of the lesser of \$750 or one-half of the lower-end of the estimated fee range. The balance of fees due are payable immediately upon our presentation of the plan or advice to you or your legal agent.

Services to be provided and the anticipated fee range are detailed in the written service agreement. Our fee is negotiable at the discretion of our firm principal and comparable services may be provided elsewhere for a lower fee.

**Fixed Fee** – We also offer our financial planning services on a fixed fee basis. The fixed rate will be based upon our current hourly billing rate multiplied by the estimated total number of hours required to complete the project.

We may require a deposit for fixed fee engagements in the amount of the lesser of \$750 or one-half of the lower-end of the estimated fee range. The balance of fees due are payable immediately upon our presentation of the plan or advice to you or your legal agent. Projects spanning more than three months may be billed quarterly.

Services to be provided and the anticipated fixed fee will be detailed in the written service agreement. Our fee is negotiable at the discretion of our firm principal and comparable services may be provided elsewhere for a lower fee.

#### **Fees for Financial Planning and Investment Consultation Packages**

<b>Financial Planning Package</b>	<b>Fee/Fee Range</b>
Comprehensive Financial Plan	\$2,000-\$4,500
Retirement Roadmap	\$1,500 - \$2,500
Bottom Line Package	\$600-\$1,000
Second Opinion Package	\$800-\$1,200
Comprehensive College Financial Aid Package	\$1,500

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<sup>2</sup> Engagements prior to 3/5/2013 may be under a pre-existing fee schedule. Further, Merit Financial Partners reserves the right (but is not obligated) to assess a lower fee to its associates and related persons' accounts maintained by the firm through its selected custodian.

**Ongoing Retainer Services** – The monthly fee is \$275 for the Premium Service, and \$150 for the Standard Service. Payment for this ongoing service can be automatically deducted from your checking account or charged to your credit card every month, at your option.

Please note that these services do not include implementation of investment advice. You control your accounts so you make the trades with our guidance. If you prefer investment management, this would be a separate service.

#### Divorce Financial Analysis and Planning Services Fees

Our fees for divorce financial analysis and planning services are assessed on an hourly basis and paid under a retainer engagement, as well as any additional costs that may be incurred for our services. The current schedule is provided in the following table, and is separate of any other legal, accounting, court, or other similar fees the client may incur involving the matter.

Service	Hourly Rate
Financial Analysis and Planning	\$ 275/hr
Court Preparation and Appearances	\$ 350/hr

The fee required to be set aside as an initial retainer against fees and costs of the engagement will be based on the estimated amount of time and expenses involved in support of the matter. All firm work will be charged against the retainer, which will be payable to our firm upon execution of the engagement agreement and until the retainer is exhausted. Additionally, the retainer may not pay all the fees and costs necessary to complete the engagement. Should the initial retainer be exhausted, we may require additional retainers in such amounts as deemed to be appropriate or will bill you on a monthly basis.

You will be required to execute an agreement that states that any remainder charges above the retainer amount will be due and payable in full within 30 days of our invoice and that any invoice not paid in 30 days will be assessed interest at the rate of 12% per annum (1% per month) plus costs of collection if applicable. In the event that any outstanding invoices are not paid in a timely fashion, our firm may terminate our services and withhold any undelivered work product.

Services to be provided and the anticipated fixed fee will be detailed in the written service agreement. Our fee is negotiable at the discretion of our firm principal and comparable services may be provided elsewhere for a lower fee.

#### Fees for Investment Management Services

Investment management services are billed as either a percentage of assets or a flat fee, calculated as a quarterly retainer. The retainer is also based on the estimated time required to address a client's specific goals or servicing needs. Estimates will consider the amount of time required at a rate of \$275 per hour.

Either you or our firm may request an adjustment to the investment management fee under certain circumstances. Common causes for such a review might include a change in your circumstances that require material adjustments to your financial plan and the reallocation of assets under our management or significant changes in assets brought into or withdrawn from your portfolio.

While there is not an asset minimum for our wealth management services program, we require a minimum retainer of \$3,000 per year, which is payable in arrears in quarterly installments of \$750.

Investment management services clients will generally be required to authorize our firm to deduct its quarterly retainer fee directly from their custodial account early in the quarter. Clients under this engagement will be provided with an account statement reflecting the deduction of the advisory fee. If the account does not contain sufficient funds to pay advisory fees, we will be granted limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. Except in the case of ERISA and IRA accounts, a client may reimburse their account for advisory fees paid to the firm.

Under certain circumstances, and at our firm's sole discretion, an investment management services client may request that we bill them directly for quarterly wealth management retainer fees, and fees will be due in full within 20 days of receipt of our firm's invoice.

In all instances, you will share responsibility for verifying the accuracy of fee calculations in your invoice and/or statement.

Further information about our fees in relationship to operational practices with our custodian is noted in Item 12 of this document.

#### Account Valuation

For purposes of determining account asset values, securities and other investment instruments traded on a market in which actual transaction prices are publicly reported will be valued at the last reported sale price on the principal market in which they are traded. If there are no sales on such date, then they will be determined by the mean between the *closing bid* and *asked price* on that date. Other readily-marketable securities will be valued using a pricing service or through quotations from one or more inter-market dealers. In the absence of a market value, we may seek an independent third party opinion or through a good faith determination by a qualified associate of our firm.

#### Potential Additional Fees

Specific product recommendations made by our firm usually involve "no-load" (i.e., no commission) products, if available, or low-load products. In some cases, such as with insurance, there may not be a suitable selection of no-load products available for recommendation, however, neither our firm nor our associates will be paid a commission on your purchase.

Any transactional or custodial fees assessed by the selected service providers, individual retirement account fees, or qualified retirement plan account termination fees are borne by you and are as provided in the current, separate fee schedule of the selected service provider. Fees paid to our firm for our services are separate from any charges you may pay for mutual funds, exchange-traded funds (ETFs) or other investments of this type. We do not receive "trailer" or SEC Rule 12b-1 fees from any investment company. Fees charged by these issuers are detailed in their prospectuses or product descriptions and you are encouraged to read these documents before investing. Our firm and its associates receive none of these described or similar fees or charges.

#### Termination of Services

Either party may terminate the agreement at any time, which will typically be in writing. Should you verbally notify our firm of the termination and, if in two business days following this notification we have not received

your notice in writing, we may make a written notice of the termination in our records and send you our own termination notice as a substitute.

If you are a new client, you may terminate an agreement with our firm within five business days after the signing of our engagement agreement without penalty or charge. Should you terminate an engagement after this date, you may be invoiced for any time charges incurred by our firm in the preparation of your plan or investment allocation strategy. In the case of any prepaid fees, we will promptly return any unearned amount.

For wealth management services accounts, following termination notice, it will be yours or your legal representative's responsibility to ensure a transfer is completed of any portfolio, account, or account residual to the receiving service provider. Our firm will not be responsible for future allocations, transactional services or investment advice upon receipt of a termination notice.

#### **Item 6 - Performance-Based Fees and Side-By-Side Management**

Our fees will not be based upon a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as "performance-based fees." Merit Financial Partners does not use a performance-based fee structure because of the potential conflict of interest this type of fee structure may pose. Performance-based compensation may create an incentive for a firm to recommend an investment that may carry a higher degree of risk to a client.

Side-by-side management refers to a firm simultaneously managing accounts that do pay performance based fees (such as a hedge fund) and those that do not; this type of arrangement, and the conflict of interest it may pose, is also not applicable to our firm's practices.

#### **Item 7 - Types of Clients**

We provide our services to individual investors, trusts, estates, retirement plans, and charitable organizations to assist them in meeting their financial objectives in what is believed to be a cost-effective way.

Our ability to provide our service and advice depends on access to important information. Accordingly, you are expected to provide us with an adequate level of information and supporting documentation throughout the term of the engagement, including but not limited to: source of funds; income levels, your (or your legal agent's) authority to act on behalf of the account, among other information. This helps us determine the appropriateness of our financial planning or investment strategy for you and your account.

It is very important that you keep us up-to-date on significant changes that may call for an update to your financial and investment plans. Events such as job changes, retirement, change in marital status, or the purchase or sale of a home can have a tremendous impact on your circumstances and needs. If we are aware of such events, we can make the adjustments needed to your plan or advice in order to keep you on track toward your goals.

We do not require minimum income levels, minimum level of assets, or other conditions for our financial planning and investment consultation services, however, for our investment management services program, we require a minimum retainer of \$3,000 per year, paid in quarterly installments.

Our firm reserves the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, pre-existing relationships or as otherwise may be determined by the Firm principal. We also reserve the right to decline services to any prospective client for any reason.

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

### **Method of Analysis**

If we are engaged to provide investment consultation or investment supervisory services, we will first evaluate several factors, including your:

- current financial situation;
- current and long-term needs;
- investment goals and objectives;
- level of investment knowledge; and
- tolerance for risk.

To achieve this, we typically employ what we believe to be an appropriate blend of fundamental and technical analyses to develop long-term investment strategies. Fundamental analysis involves evaluating economic factors including interest rates, current state of the economy, and future growth of an issuer or sector, among others. Technical analysis may involve studying securities, markets, or economies as a whole in an effort to determine potential future behaviors. By combining these analyses, the firm believes it may better assist the client in determining the appropriate strategy that has been adapted to their requirements and goals.

Our research and recommendations may be drawn from sources that include financial publications; investment analysis and reporting software; research materials from outside sources; corporate rating services; annual reports, prospectuses and other regulatory filings; and company press releases.

We make asset allocation and investment policy decisions based on these and other factors. We will then discuss with you how, in our best judgment, to meet your objectives while at the same time seeking a prudent level of risk exposure.

### **Investment Strategies**

Investment policy decisions are made, in our best judgment, to help you achieve your overall financial objectives while minimizing risk exposure.

We believe asset allocation is a key component of investment portfolio design, and that the appropriate allocation of assets across diverse investment categories (stock vs. bond, foreign vs. domestic, large cap vs. small cap, etc.) is a primary determinant of portfolio returns and critical to the long-term success of an investor's financial objectives.

We generally use low-cost investments such as index mutual funds and ETFs whenever it is possible and reasonable to do so, though stocks, bonds, no load actively managed mutual funds, closed-end funds, and other publicly traded securities also may be used to achieve this mix.

### **Risk of Loss**

While we believe our strategies and investment recommendation are designed to potentially produce the highest possible return for a given level of risk, we cannot guarantee that an investment objective or planning goal will be achieved. Past performance is not necessarily indicative of future results.

Some investment decisions may result in loss, including potential loss of the original principal invested. Each client must be able to bear the various risks involved in the investment of account assets, which may include market, currency, interest rate, liquidity, and operational or political risk, among others.

When our research and analyses is based upon commercially available software, rating services, general market and financial information, or due diligence reviews, we are relying upon the accuracy and validity of the information or capabilities being provided by selected vendors, rating services, market data, and the issuers themselves. We make a reasonable effort to determine the accuracy of the information received but we cannot predict events, actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice to a client or account.

When a portfolio employs a passive, efficient markets theory, you will need to consider the potential risk that your broader allocation may generate lower-than-expected returns than that from a specific asset, and that the return on each type of asset is a deviation from the average return from the asset class.

We believe this variance from the “expected return” is generally low under normal market conditions if the portfolio is made up of diverse, non-correlated assets.

If your preferred investment strategy involves more frequent trading, it may result in additional transactional costs or create taxable events, and in some instances potentially reducing or negating any benefit derived by shorter term investing.

Investment vehicles such as ETFs and indexed funds have the potential to be affected by or “tracking error risk,” which might be defined as a deviation from their stated benchmark (index). Since the core of a portfolio may attempt to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a “sample index” that may not as closely align the stated benchmark. In these instances, the firm may choose to reduce the weighting of a holding or use a “replicate index” position as part of its core holdings to minimize the effects of the tracking error in relation to the overall portfolio.

Also, while many index funds and ETFs are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are certain asset classes or holding periods within a fund or ETF that may not benefit. Shorter holding periods or certain commodities and currencies (potentially within the fund/ETF) may be considered nonqualified, therefore the investments QDI will be considered if tax efficiency is an important aspect of your portfolio.

## **Workshop Presentations**

We may provide educational workshops on an “as announced” basis for groups desiring general advice on investments and personal finance. Topics may include issues related to wealth management, financial planning, retirement strategies, or various other economic and investment topics.

Our workshops are educational in nature and do not involve the sale of any investment. Information presented will not be based on any one person’s need nor do we provide individualized investment advice to attendees during an event general session.

## **Item 9 - Disciplinary Information**

Neither Merit Financial Partners nor any member of our firm's management has been involved in a material criminal or civil action, administrative enforcement, or self-regulatory organization proceeding that would reflect upon our firm's advisory business or the integrity of our firm.

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

Our policies require our firm and its associates to conduct business activities in a manner that avoid actual or potential conflicts of interest between the firm, its employees and clients, or that may be contrary to law.

We will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest which might reasonably compromise our impartiality or independence.

Investment advisory representatives of Merit Financial Partners may be associated with and/or serve in control capacities of other registered investment advisors that are not affiliated with our firm. Under these arrangements these representatives are able to provide financial planning and investment consultation services to their own clients as a representative of the other firm, however, investment management services clients are engaged under an agreement through Merit Financial Partners. Therefore, certain clients may have more than one investment advisor (firm) relationship. Representatives will at all times disclose, in advance of a transaction or agreement, the capacity in which they are serving a client, to include the potential or actual conflict of interest the role or service may incur.

Neither the firm nor any associate is affiliated with a bank, FINRA or NFA broker/dealer.

Associates of the firm may hold individual membership or serve on committees or board of professional industry associations such as the National Association of Personal Financial Advisors (NAPFA), Financial Planning Association (FPA), or the Certified Financial Planner Board of Standards, Inc. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and ongoing educational requirements.

Principal and Founding Partner Elizabeth Cox, CPA is individually licensed as a CPA with the Connecticut Board of Accountancy and is a member of the AICPA.

Certified Public Accountants (CPAs) are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination.

In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year periods or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (any obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when

providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

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

##### **Code of Ethics**

We have adopted a Code of Ethics that establishes policies of ethical conduct for all our personnel. Our firm accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Our policies include prohibitions against insider trading, circulation of industry rumor, certain political contributions, among others.

All associates are expected to adhere to the Certified Financial Planner Board of Standards Code of Ethics regardless of whether or not they are a CFP designee. These principles include these principals include Integrity, Objectivity, Competence, Fairness, Confidentiality, Professionalism, and Diligence. A full explanation of these and other standards which we, as CFP designees follow, can be found at the Certified Financial Planning Board's website at <https://www.cfp.net/docs/default-source/for-cfp-pros---professional-standards-enforcement/cfp-board-code-and-standards.pdf?sfvrsn=23>.

Additionally, associates of our firm that are NAPFA adhere to the NAPFA *Fiduciary Oath* that states that:

*"The advisor shall exercise his/her best efforts to act in good faith and in the best interests of the client.*

*The advisor shall provide written disclosure to the client prior to the engagement of the advisor, and thereafter throughout the term of the engagement, of any conflicts of interest, which will or reasonably may compromise the impartiality or independence of the advisor.*

*The advisor, or any party in which the advisor has a financial interest, does not receive any compensation or other remuneration that is contingent on any client's purchase or sale of a financial product.*

*The advisor does not receive a fee or other compensation from another party based on the referral of a client or the client's business.*

##### ***Following the NAPFA Fiduciary Oath means I shall:***

- \* Always act in good faith and with candor.*
- \* Be proactive in disclosing any conflicts of interest that may impact a client.*
- \* Not accept any referral fees or compensation contingent upon the purchase or sale of a financial product."*

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually.

Our firm will provide of copy of its Code of Ethics to any client or prospective client upon request.

##### **Privacy Policy**

At Merit Financial Partners, we respect the personal financial privacy of all our clients and prospective clients, past and present. We realize you have entrusted us with personal financial information, and it is important to us that all employees and clients of our firm know our policy concerning what we do with that information.



We collect personal financial information about our clients from the following sources:

- Information our clients provide to us to complete their financial plan or investment recommendation;
- Information our clients provide to us in agreements, account applications, and other documents completed in connection with the opening and maintenance of their accounts;
- Information our clients provide to us orally; and
- Information we may receive from third parties, such as custodians, about client transactions.

We do not disclose nonpublic personal financial information about our clients to anyone, except in the following circumstances:

- When required to provide services our clients have requested;
- When our clients have specifically authorized us to do so **in writing**;
- When required during the course of a firm assessment (i.e., independent audit); or
- When permitted or required by law (i.e., periodic regulatory examination).

Within our company, we restrict access to client information to the employees who need to know that information. To ensure security and confidentiality, we maintain physical, electronic, and procedural safeguards to protect the privacy of our clients.

In addition, all employees and officers understand that everything handled in our firm's office is private and confidential. Nothing about our clients is to be discussed outside our offices with family, friends or other clients; within the office, employees only discuss what is needed to complete the task. Most importantly, they are instructed to not discuss a client's situation with someone else that may request information about an account unless they are specifically authorized in writing by the client to do so. This includes, for example, providing information to a husband on his wife's IRA account; son or daughter about their mom or dad's accounts, etc.

We will notify you annually of our privacy policy and at any time, in advance, if our policy is expected to change.

#### Participation or Interest in Client Transactions

Neither our firm, associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc.

Our employees are prohibited from borrowing from or lending to a client unless the client is an approved financial institution.

We recognize that should we act as the advisor to the sponsor of an ERISA-qualified retirement plan (i.e., 401(k) or pension plan) and one of our associates serves in an advisory capacity to one or more of the plan's participants, a potential or implied conflict of interest may occur. We may require our associate to cease in this plan participant advisory capacity or, upon disclosure to and approval from the plan sponsor, allow the dual advisory role to continue with consideration being made to offset fees where appropriate.

Our firm provides a range of services to you and all of our clients, which includes financial planning, investment consultation services, and investment supervisory services where we are paid a fee. Due to our firm's ability to offer one or more of these services to you, a potential conflict of interest may exist. Therefore, you are under

no obligation to act upon our recommendations and, if you elect to act on any of our recommendations, you are under no obligation to complete all of them through our firm.

### Personal Trading

Our firm does not trade for its own account (e.g. proprietary account trading). Firm “related persons” may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. At no time, however, will our firm or any related party receive preferential treatment over our clients.

In an effort to reduce or eliminate certain conflicts of interest involving personal trading (such as trading ahead of a client order), our policy may require that we restrict or prohibit associates’ transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by a principal of our firm in advance of the transaction in an account, and we will maintain the required personal securities transaction records per current regulation.

### Item 12 - Brokerage Practices

Merit Financial Partners is not affiliated with any bank, custodian, or broker-dealer firm (“service provider”). When engaged to provide wealth management services, we typically use the custodial services of the institutional services division of Charles Schwab & Co., Inc. (“Schwab.”)

Schwab will hold your assets in an account in your name and will buy and sell securities when we instruct them. While we recommend that you use Schwab as your service provider, you must decide whether to do so and your account will be entered into via an account agreement directly with that firm. We technically do not open the account for you, although we will assist you in doing so.

The institutional platform services that Schwab provides us includes, among others, brokerage, custody, and other related services. Schwab’s services assist us in managing and administering clients’ accounts include software and other technology that:

- provide access to client account data (such as trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide limited research, securities pricing and other market data;
- facilitate payment of fees from clients’ accounts;
- online document storage of client accounts held at Schwab; and
- assist with certain back-office functions, recordkeeping and client reporting.

Schwab also offers other services intended to help the firm manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, industry publications, access to educational conferences and webinars, access to other third-party service providers that provide a wide array of business-related services and technology with whom the firm may directly contract.

Many of Schwab’s services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us as long as our advisory firm maintains client account assets with their firm. We are not required to maintain a collective minimum asset level; however, Schwab may charge accountholders transaction-related fees for certain securities trades executed through them.

Schwab provides our firm with certain brokerage and research products and services that may qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 or similar state statute. The availability of these services benefits us because we do not have to separately produce or purchase them. We do not have to pay for these services as long as our clients maintain assets in accounts with Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody.

This is a potential conflict of interest, but we believe our selection of Schwab as custodian is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services and not their services that benefit only us.

We periodically conduct an assessment of any service provider we recommend, including Schwab, which generally includes a review of their range of services, reasonableness of fees, among other items, and in comparison to their industry peers.

#### Best Execution

Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed in the previous section. We recognize our obligation in seeking "best execution" for our clients; however, it is our belief that the determinative factor is not always the lowest possible cost but whether the selected service provider's transactions represent the best "qualitative" execution while taking into consideration the full range of services provided. Therefore, we will seek services involving competitive rates but it may not necessarily result in the lowest possible rate for each transaction. We have determined that having Schwab execute our trades is consistent with our duty to seek "best execution."

We periodically review policies regarding our recommending service providers to our clients in light of our duty to seek "best execution."

#### Client Referrals

All compensation paid to our firm is paid directly by our clients and, therefore, we do not receive additional compensation when you engage a recommended service provider.

#### Directed Brokerage

We do not require or engage in directed brokerage involving our accounts.

As our client, you may direct our firm (in writing) to use another particular broker-dealer to execute some or all transactions for your account. In these circumstances, you will be responsible for negotiating, in advance, the terms and/or arrangements for your account with your selected broker-dealer. We will not be obligated to seek better execution services or prices from these other broker-dealers, or be able to aggregate your transactions, should we choose to do so, for execution through other custodians with orders for other accounts managed by our firm.

As a result, you may pay higher commissions or other transaction costs, experience greater spreads, or receive less favorable net prices, on transactions for your account than would otherwise be the case. Further, pursuant to our obligation of best execution, we may decline a request to direct brokerage if we believe any directed brokerage arrangement would result in additional operational difficulties or risk to our firm.

#### Trade Aggregation

Transactions for each of our clients will generally be effected independently unless we decide to purchase or sell the same securities for several clients at approximately the same time, often termed “aggregated” or “batched” orders. We do not receive any additional compensation or remuneration as a result of aggregated transactions.

We may (but are not obligated to) aggregate orders in an attempt to obtain better execution, negotiate favorable transaction rates, or to allocate equitably among our client accounts should there be differences in prices and commissions or other transaction costs that might have been obtained had such orders been separately placed.

Should we aggregate orders, transactions will generally be averaged as to price and allocated among each client on a pro-rated basis on any given day and we will attempt to do so in accordance with applicable industry rules. Client accounts where trade aggregation is not allowed or infeasible may be assessed higher transaction costs than those that are batched.

We review both our trade aggregation procedures and allocation processes on a periodic basis to ensure they remain within stated policies and regulation. We will inform you, in advance, should our trade aggregation and allocation practices change at any point in the future.

### **Item 13 - Review of Accounts**

#### ***Financial Planning and Investment Consultation Services***

Periodic financial check-ups or reviews are recommended for clients receiving financial planning and investment consultation services, and it is the client's responsibility to initiate these reviews.

A good rule-of-thumb for future visits is annually or as material changes occur in your financial situation (i.e., loss of a job, retirement, receipt of a significant bonus, an inheritance, the birth of a new child, or other circumstances).

Reviews will be conducted by the assigned financial planner and normally involve analysis and possible revision of a previous financial plan or investment allocation. Portfolio "snapshot" reports may be provided when our firm is engaged to provide asset allocation or investment advice as part of its Investment Consultation Service, however, we will not provide ongoing performance reporting under this engagement.

***Divorce Financial Analysis and Planning Services*** – Engagements under our Divorce Financial Analysis and Planning Services are considered incidental advice, or one-time in nature, and end after advice or an assessment has been delivered. No subsequent reviews are offered.

#### ***Investment Advisory Services***

Accounts are periodically reviewed throughout the year by the assigned investment advisor representative, supervisory personnel, or a qualified independent entity engaged by our firm. A change in the asset allocation strategy for a client account or an “out-of-balance” situation may trigger additional reviews or account rebalancing.

We also prefer that our clients meet with their investment advisor representative at least annually and more often if deemed necessary or desirable to conduct a review of their account.

Clients are provided periodic performance summary reports and annual realized gains/loss reports for taxable accounts. Some of our clients may receive additional reports depending on their specific requirements.

Our clients will also receive account statements sent directly from mutual fund companies, transfer agents, custodians or brokerage companies where their investments are maintained. Clients should review these account statements carefully and compare them to any reports provided by Merit Financial Partners.

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

We do not engage in solicitation activities as defined by statute.

As noted earlier, Merit Financial Partners, LLC and its associates may be members of FPA, NAPFA or other professional associations. A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for participant firms or individual financial planners within a selected state or region. A portion of our membership fees may be used so that our name will be listed in some or all of these entities' websites (or other listings).

These passive websites may provide means for interested persons to contact a firm or financial planner via electronic mail, telephone number, or other contact information, in order to interview the participating firm or planner. Members of the public may also choose to telephone association staff to inquire about a firm or individual planner within their area, and they would receive the same or similar information. Prospective clients locating our firm or one of our associates via this method are not actively marketed by these associations. Clients who find us in this way do not pay more for their services than clients referred to us in another fashion, such as by another client. We do not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.<sup>3</sup>

We may provide referrals to various other professionals, such as an attorney, as a service to our clients. We do not have an agreement with or receive referral fees from these professionals for these informal referrals. Any fees charged by these other entities for their services are completely separate from fees charged by Merit Financial Partners.

#### **Item 15 - Custody**

Your funds and securities will be maintained by an unaffiliated, qualified custodian that you select, such as a bank; broker/dealer, mutual fund company, or transfer agent, not with our firm or our associates.

In keeping with our policy of not having physical custody of client funds or securities, we:

- Restrict our firm and associates from acting as trustee for or having general power of attorney over a client account;
- Are prohibited from having authority to directly withdraw securities or money from a client account, other than for payment of our advisory fees that is accomplished through a qualified custodian and pursuant a written agreement (termed "constructive custody");
- Do not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm;
- Will not collect advance fees for our advisory services to be performed more than six months in advance; and

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<sup>3</sup> The firm believes this arrangement is in consonance with SEC No-Action Letter No. 1251421 in its response to the National Football League Players Association.

- Will not authorize any associate to have knowledge of a client's account access information (i.e., online 401(k), brokerage or bank accounts), even for the convenience or accommodation of the client or their legal agent.

You will be provided with transaction confirmations and summary account statements provided directly to you by your selected service provider. Typically, these statements are provided on a monthly or quarterly basis, or as transactions occur. You should review these statements carefully. We will not create a statement for you nor be the sole recipient of your account statements.

You may receive periodic reports or "snapshots" from our firm that may include investment performance information. You are urged to compare your account statements that you have received directly from your service provider with any report you receive from our firm.

#### **Item 16 - Investment Discretion**

At Merit Financial Partners, we believe in a consultative approach to investment management services. We provide our investment management services to our clients through an investment advisory agreement with Charles Schwab and Company and you have given Merit Financial Partners, LLC the authority to make trades on your behalf and disburse funds directly to you. We are therefore deemed to be managing these accounts on a discretionary basis. We will advise you in advance and seek your approval before implementing an investment decision, but acknowledge that in certain situations such pre-approval may not be possible. You must make yourself available and keep our firm apprised of your current contact information so that transaction instructions can be efficiently effected on your behalf.

We require all account restrictions, limitations, and rescissions will be made in writing by our clients and approved in writing by the firm principal. We will maintain a record of these requests and they will be retained per regulation.

#### **Item 17 - Voting Client Securities**

##### **Proxy Voting**

Our firm does not vote proxies on your behalf nor do we offer guidance on the voting of client proxies. You will maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities that are beneficially owned by you shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other events pertaining to your holdings.

##### **Other Corporate Actions**

We will have no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets.

##### **Receipt of Materials**

You may receive proxies or other solicitations directly from your selected custodian or transfer agent. If our firm receives correspondence relating to the voting of your securities, class action litigation, or other corporate actions, we typically forward the correspondence to your address of record or to another entity such as your attorney if you direct us to do so.

## **Item 18 - Financial Information**

### **Balance Sheet**

Our firm will not take physical custody of your assets. Advisory fee withdrawals must be done through your custodian of record with your prior written approval, and following your receipt of our written notice ("constructive custody").

Our engagements do not require that we will collect fees from you of \$1,200 or more for our advisory services we will perform six months or more in advance.

Neither our firm nor its management serves as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

Due to the nature of our firm's services and operational practices, an audited balance sheet is not required by statute nor included in this brochure.

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

The firm and its management do not have a financial condition likely to impair our ability to meet our commitment to our clients. The firm and its management have not been the subject of a bankruptcy petition at any time during the past 10 years.

## **ADV Part 2B – Brochure Supplement (Advisory Personnel Information) – Michael Terry**

This document provides information that supplements the Merit Financial Partners brochure, which is referenced in the preceding pages. Please contact Mr. Terry at (718) 898-0871 if you did not receive the firm's advisory services brochure or if you have any questions about the contents of this supplement.

### **Item 1 - Firm Information**

Merit Financial Partners, LLC  
69-64 Grand Avenue  
Maspeth, NY 11378  
(718) 898-0871  
[www.meritfinancialpartners.com](http://www.meritfinancialpartners.com)

Merit Financial Partners, LLC  
191 Post Road West  
Westport, CT 06880  
(203) 221-2799  
[www.meritfinancialpartners.com](http://www.meritfinancialpartners.com)

### **Item 2 - Educational Background and Business Experience**

#### **Managing Member/Principal/Chief Compliance Officer (Supervisor)/Investment Advisor Representative**

Richard Michael Terry  
Born: 1949  
CRD # 4406407

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

##### ***Educational Background***

Memphis State University; BA English Literature (1971)  
Memphis State University; Bachelor of Music (1977)  
Memphis State University; Master of Music (1979)  
New York University; MBA Finance/CAIS (1987)  
CERTIFIED FINANCIAL PLANNER™ Practitioner (CFP®)<sup>5</sup> (1997)  
Accredited Asset Management Specialist<sup>SM</sup> (AAMS®)<sup>6</sup> (1998)

##### ***Business Experience***

Merit Financial Partners, LLC (formerly MTP Advisors); Maspeth, NY – President/Managing Partner (2006-Present)  
Financial Asset Management; New York, NY - Financial Planner (1998-2006)

### **Item 3 - Disciplinary Information**

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item. There are no criminal or civil actions, administrative enforcement proceedings, self-regulatory organization enforcement proceedings or any other proceedings applicable to the firm or Mr. Terry.



#### **Item 4 - Other Business Activities**

Mr. Terry is not engaged in another reportable business activity. He is not registered nor has an application pending to register as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor.

Therefore, Mr. Terry does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products, including that as a registered representative of a broker/dealer, and including distribution or service ("trail") fees from the sale of mutual funds.

#### **Item 5 - Additional Compensation**

Mr. Terry is not compensated for advisory services involving performance-based fees, nor does he or the firm have a material relationship involving an issuer of a security. Our firm also prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients.

#### **Item 6 - Supervision**

Mr. Terry serves in multiple capacities with our firm, such as Partner, Chief Compliance Officer and Investment Advisor Representative. We recognize by not having all organizational duties segregated may potentially create a conflict of interest, however, we believe our policies and procedures are designed to ensure appropriate recordkeeping and supervision. Certain functions may be outsourced to assist in these efforts when deemed necessary. Questions relative to the firm, its services, or this ADV Part 2 may be made to the attention of Mr. Terry at (718) 898-0871. Ms. Cox serves as Mr. Terry's Supervisor in situations covering his and his immediate family's investments to mitigate this conflict of interest.

Additional information about our firm, other advisory firms, associated investment advisor representatives, including Mr. Terry, is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms or their associated personnel can be accomplished by their name or a unique firm identifier, known as an *IARD number*. The IARD number for Merit Financial Partners, LLC is 141359.

The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling the New York State Department of Law, Investment Protection Bureau at (212) 416-8285.

## **ADV Part 2B – Brochure Supplement (Advisory Personnel Information) – Elizabeth Cox**

This document provides information that supplements the Merit Financial Partners brochure, which is referenced in the preceding pages. Please contact Mr. Terry at (718) 898-0871 if you did not receive the firm's advisory services brochure or if you have any questions about the contents of this supplement.

### **Item 1 - Firm Information**

191 Post Road West  
Westport, CT 06880  
(203) 221-2799  
www.meritfinancialpartners.com

### **Item 2 - Educational Background and Business Experience**

#### **Managing Member/Principal/Investment Advisor Representative**

Elizabeth M. Cox  
Born 1962  
CRD # 2235759

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

##### ***Educational Background***

Middlebury College; BA American Literature (1984)  
Columbia University (SIPA); MIA International Finance (1989)  
Certified Divorce Financial Analyst™ (CDFA®)<sup>7</sup> (2006)  
CERTIFIED FINANCIAL PLANNER™ Practitioner (CFP®)<sup>5</sup> (2007)  
Certified Public Accountant<sup>8</sup> (2015)

##### ***Business Experience***

Merit Financial Partners (formerly MTP Advisors); Maspeth, NY – IAR/Managing Partner (2010-Present)  
Cox Financial Services, LLC; Westport, CT - Principal (2009-2016)  
Raymond James Financial Services, LLC; Wilton, CT (2006-2009)  
Bloomberg Tradebook; New York, NY - Sales (1999-2000)  
Deutsche Bank Securities; New York, NY - Director, International Sales-Trading (1996-1999)  
ING Baring Securities; New York, NY - Senior Vice President, Latin American Sales-Trading (1992-1996)

### **Item 3 - Disciplinary Information**

No information is applicable to this Item. There are no criminal or civil actions, administrative enforcement proceedings, self-regulatory organization enforcement proceedings or any other proceedings applicable to Ms. Cox.

### **Item 4 - Other Business Activities**

Ms. Cox is not engaged in another reportable business activity. She is not registered nor has an application pending to register as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. Therefore, Ms. Cox does not receive commissions, bonuses or other compensation based on the sale of securities or other investment

products, including that as a registered representative of a broker/dealer, and including distribution or service (“trail”) fees from the sale of mutual funds.

**Item 5 - Additional Compensation**

Ms. Cox is not compensated for advisory services involving performance-based fees, nor does she have a material relationship involving an issuer of a security. Our firm also prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients.

**Item 6 - Supervision**

Ms. Cox serves in multiple capacities with our firm, such as Partner and Investment Advisor Representative. Mr. Terry serves as Ms. Cox’s supervisor as Compliance Officer for Merit Financial Partners. Questions relative to the firm, its services, or this ADV Part 2 may be made to the attention of Mr. Terry at (718) 898-0871 or to Ms. Elizabeth Cox at (203) 221-2799.

Additional information about our firm, other advisory firms, associated investment advisor representatives, including Ms. Cox, is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **ADV Part 2B – Brochure Supplement (Advisory Personnel Information) – Hrefna S. Martin**

This document provides information that supplements the Merit Financial Partners brochure, which is referenced in the preceding pages. Please contact Mr. Terry at (718) 898-0871 if you did not receive the firm's advisory services brochure or if you have any questions about the contents of this supplement.

### **Item 1 - Firm Information**

Merit Financial Partners, LLC  
191 Post Road West  
Westport, CT 06880  
(203) 221-2799  
www.meritfinancialpartners.com

### **Item 2 - Educational Background and Business Experience**

#### **Investment Advisor Representative**

Hrefna S. Martin  
Born 1975  
CRD # 5923804

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

##### ***Educational Background***

Pace University; MBA Financial Management (2003)  
University of Iceland; BS Food Science (2001)  
CERTIFIED FINANCIAL PLANNER™ Practitioner (CFP®)  
Enrolled Agent (EA)<sup>9</sup>

##### ***Business Experience***

Merit Financial Partners (formerly MTP Advisors); Maspeth, NY - IAR (2015-Present)  
Cox Financial Services, LLC; Westport, CT – Investment Advisor Representative (2015-2016)  
Resnick Advisors; Westport, CT – Investment Advisor Representative (2011 – 2015)  
Novos Planning Associates, Inc.; New York, NY – Investment Associate (2003-2011)

### **Item 3 - Disciplinary Information**

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item. There are no criminal or civil actions, administrative enforcement proceedings, self-regulatory organization enforcement proceedings or any other proceedings applicable to the firm or Ms. Martin.

### **Item 4 - Other Business Activities**

Ms. Martin is an investment advisor representative of Merit Financial Partners. Ms. Martin provides financial planning and investment consultation services to her own clients as an investment advisor representative of Merit Financial Partners.

Ms. Martin is not engaged in another reportable business activity. She is not registered nor has an application pending to register as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. Therefore, Ms. Martin does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products, including that as a registered representative of a broker/dealer, and including distribution or service ("trail") fees from the sale of mutual funds.

**Item 5 - Additional Compensation**

Ms. Martin is not compensated for advisory services involving performance-based fees, nor does she have a material relationship involving an issuer of a security. Our firm also prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients.

**Item 6 - Supervision**

Ms. Cox serves as Ms. Martin's supervisor while she serves clients under the Merit Financial Partners Wealth Management Services program. Questions relative to the firm, its services, or this ADV Part 2 may be made to the attention of Mr. Terry at (718) 898-0871 or Ms. Cox at (203) 221-2799.

Additional information about our firm, other advisory firms, associated investment advisor representatives, including Ms. Martin, is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **ADV Part 2B – Brochure Supplement (Advisory Personnel Information) – Melissa S. Adams**

This document provides information that supplements the Merit Financial Partners brochure, which is referenced in the preceding pages. Please contact Mr. Terry at (718) 898-0871 if you did not receive the firm's advisory services brochure or if you have any questions about the contents of this supplement.

### **Item 1 - Firm Information**

Merit Financial Partners, LLC  
191 Post Road West

Westport, CT 06880

(203) 221-2799

[www.meritfinancialpartners.com](http://www.meritfinancialpartners.com)

### **Item 2 - Educational Background and Business Experience**

#### **Investment Advisor Representative**

Melissa S. Adams  
Born 1968  
CRD # 2147886

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

Retirement Strategy Program, University of Pennsylvania, The Wharton School (2007)

Bachelor of Art, Economics, University of California, San Diego (1991)

CERTIFIED FINANCIAL PLANNER™ Practitioner (CFP®) (1999)

Chartered Life Underwriter, The American College (2001)

#### ***Business Experience***

Merit Financial Partners, LLC; Westport, CT – Investment Advisor Representative (2018-Present)  
Prudential Financial, Shelton, CT—Vice President, Senior Sub-Advisor Relationship Manager (2007-2017)

### **Item 3 - Disciplinary Information**

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item. There are no criminal or civil actions, administrative enforcement proceedings, self-regulatory organization enforcement proceedings or any other proceedings applicable to the firm or Ms. Adams.

### **Item 4 - Other Business Activities**

Ms. Adams is not currently engaged in any business activities outside of the firm.

Ms. Adams is not registered nor has an application pending to register as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity

trading advisor. Therefore, Ms. Adams does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products, including that as a registered representative of a broker/dealer, and including distribution or service (“trail”) fees from the sale of mutual funds.

### **Item 5 - Additional Compensation**

Ms. Adams is not compensated for advisory services involving performance-based fees, nor does she have a material relationship involving an issuer of a security. Our firm also prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients.

### **Item 6 - Supervision**

Mr. Terry, the firm’s Chief Compliance Officer, serves as Ms. Adams’s supervisor. Questions relative to the firm, its services, or this ADV Part 2 may be made to the attention of Mr. Terry at (718) 898-0871.

Additional information about our firm, other advisory firms, associated investment advisor representatives, including Ms. Adams, is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **About Professional Designations**

<sup>5</sup> The **CERTIFIED FINANCIAL PLANNER™**, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

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

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

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

<sup>6</sup>The **ACCREDITED ASSET MANAGEMENT SPECIALIST<sup>SM</sup>** AND **AAMS<sup>®</sup>** designation is awarded by The College for Financial Planning<sup>®</sup> to students who:

- successfully complete the AAMS<sup>®</sup> educational program;
- pass the final examination; and
- comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct.
- every two years renew their right to continue using the AAMS<sup>®</sup> designation by completing 16 hours of continuing education; reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct; and paying a biennial renewal fee.

<sup>7</sup>The **Certified Divorce Financial Analyst<sup>TM</sup>** (CDFA<sup>®</sup>) is offered through The Institute of Divorce Financial Analysts and requires two years of financial services industry experience, the completion of a self-study course and computer-based examination. Every two years, designation holders must complete 20 hours of continuing education and pay requisite fees to retain the CDFA<sup>TM</sup> designation.

<sup>8</sup>**Certified Public Accountants (CPAs)** are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination.

In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year periods or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (any obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

<sup>9</sup>An **Enrolled Agent (EA)** is a federally-authorized tax practitioner who has technical expertise in the field of taxation and who is empowered by the U.S. Department of the Treasury to represent taxpayers before all administrative levels of the Internal Revenue Service for audits, collections, and appeals. The license is earned in one of two ways, by passing a comprehensive examination which covers all aspects of the tax code, or having worked at the IRS for five years in a position which regularly interpreted and applied the tax code and its regulations. All candidates are subjected to a rigorous background check conducted by the IRS.

The IRS Restructuring and Reform Act of 1998 allow federally authorized practitioners (those bound by the Department of Treasury's Circular 230 regulations) a limited client privilege. This privilege allows confidentiality between the taxpayer and the Enrolled Agent under certain conditions. The privilege applies to situations in which the taxpayer is being represented in cases involving audits and collection matters. It is not applicable to the preparation and filing of a tax return. This privilege does not apply to state tax matters, although a number of states have an accountant-client privilege.

In addition to the stringent testing and application process, the IRS requires Enrolled Agents to complete 72 hours of continuing professional education, reported every three years, to maintain their Enrolled Agent status. National Association of Enrolled Agents (NAEA) members are obligated to complete 90 hours per three year reporting period. Because of the knowledge necessary to become an Enrolled Agent and the requirements to maintain the license, there are only about 46,000 practicing Enrolled Agents.

Only Enrolled Agents are required to demonstrate to the IRS their competence in matters of taxation before they may represent a taxpayer before the IRS. Unlike attorneys and CPAs, who may or may not choose to specialize in taxes, all Enrolled Agents specialize in taxation.

Enrolled Agents are the only taxpayer representatives who receive their right to practice from the U.S. government (CPAs and attorneys are licensed by the states).



Enrolled Agents are required to abide by the provisions of the Department of Treasury's Circular 230, which provides the regulations governing the practice of Enrolled Agents before the IRS. NAEA members are also bound by a Code of Ethics and Rules of Professional Conduct of the Association.