



## **Financial Life Focus, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 22, 2020**

This Form ADV 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Financial Life Focus, LLC (herein "Financial Life Focus" or the "Advisor"). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (973) 533-0666 or by email at [pnicta@financial-lifefocus.com](mailto:pnicta@financial-lifefocus.com).

Financial Life Focus, LLC is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Financial Life Focus to assist you in determining whether to retain the Advisor.

Additional information about Financial Life Focus and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 152904.

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## **Item 2 – Material Changes**

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Financial Life Focus. For convenience, the Advisor has combined these documents into a single disclosure document.

Financial Life Focus believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with the complete and accurate information at all times. The Advisor encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs in the business practices of Financial Life Focus.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 152904. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (973) 533-0666.

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## **Item 4 – Advisory Services**

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Founded by its managing member and principal owner, Michael Kay, Financial Life Focus, LLC (“Financial Life Focus” or the “Advisor”) provides financial life planning on behalf of individuals, high net worth individual, trusts, estates, charities and pension/profit sharing plans (each a “Client”).

The Advisor applies the principles of Financial Life Planning® to develop and nurture mutually beneficial relationships with its Clients and their families. Financial Life Focus aims to empower its Clients to approach their lives and resources in a balanced and successful manner by seeking to: act with integrity, compassion, and the highest level of professional standards; guide Clients to understand and articulate their core values and improve their comfort in addressing financial issues; explore Clients’ needs and concerns and help them to navigate life transitions; and create and support the implementation of wealth-building strategies that align with Clients’ goals and dreams.

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Financial Life Focus’ fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Prior to engaging Financial Life Focus to provide financial life services, the Client is required to enter into one or more written agreements with the Advisor setting forth the terms and conditions under which Financial Life Focus renders its services (collectively the “Agreement”).

Financial Life Focus is a limited liability company formed in the State of New Jersey, which has been in business since October 2001. Financial Life Focus has been a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”) and has been in business since June 2010. The Advisor has \$242,710,000 in Client assets under management as of December 31, 2019, all of which are managed on a non-discretionary basis.

This Disclosure Brochure describes the business of Financial Life Focus. Certain sections will also describe the activities of its associated persons (herein our “Supervised Persons”). Supervised Persons are any of the Advisor’s officers, partners, directors (or other persons occupying a similar status or performing similar functions), or employees, or any other person who provides investment advice on Financial Life Focus’ behalf and is subject to Financial Life Focus’ supervision or control.

### Financial Life Services

Financial Life Focus works closely with its Clients by providing comprehensive advisory services through an ongoing advisory retainer. The Advisor’s services provide Clients with a broad range of comprehensive and personalized financial planning along with non-discretionary management of the Client’ investment portfolios.

Details of these services are described below. The terms of these retainer services are more fully set forth in the Financial Life Focus advisory agreement. In delivering these services, the Advisor typically meets with Clients throughout the year, through in-person meetings, phone calls and electronic communications.

### Financial Planning Services

Financial Life Focus may provide its Clients with a broad range of comprehensive financial planning services. As detailed in Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss these services are based on the principles of Financial Life Planning®.

The Client is not obligated to implement any suggestions made by the Advisor in the financial plan, and may accept or reject any of Financial Life Focus’ recommendations. In order to keep the financial plan current, the Client is advised to notify the Advisor if there is ever any change in financial situation or investment objectives. Financial planning supports the Advisor’s investment management services, and the financial plan drives any management decisions. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

### Investment Management Services

Clients can engage Financial Life Focus to manage all or a portion of their assets on a non-discretionary basis. Financial Life Focus primarily allocates Clients' investment management assets among institutional mutual funds and exchange-traded funds ("ETFs"), in accordance with the investment objectives of the Client. To accomplish this, and as further discussed in response to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss and Item 12 – Brokerage Practices below, Financial Life Focus recommends that Clients use the asset allocation services of Buckingham Strategic Partners, LLC ("BSP"). BSP is an unaffiliated investment advisor registered with the SEC. BSP provides an asset allocation and investment account management platform and associated administrative services to Financial Life Focus and its Clients.

Financial Life Focus tailors its advisory services to the individual needs of Clients. The Advisor consults with each Client to discuss their risk tolerance and financial situation initially and on an ongoing basis to develop a Statement of Investment Selection ("SIS"), which determines risk tolerance, time horizon and other factors that may impact the Client's investment needs. Prior to completing a SIS, the Advisor requests that the Client completes a risk tolerance assessment. Financial Focus ensures that the Client's investments are suitable for their investment needs, goals, objectives and risk tolerance. Financial Life Focus then provides the Client's investment strategy, trade restrictions and target allocation to BSP to implement the plan.

Clients may impose reasonable restrictions or mandates on the management of their account[s] if, in Financial Life Focus' sole discretion, the conditions will not materially impact the performance of a portfolio strategy or prove overly burdensome to its management efforts.

### Retirement Plan Advisory Services

Financial Life Focus provides retirement plan advisory services on behalf of the retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring [OR] Review
- Investment Oversight Services (ERISA 3(21))
- Performance Reporting
- Ongoing Investment Recommendation and Assistance

These services are provided by Financial Life Focus serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of Financial Life Focus' fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

## **Item 5 – Fees and Compensation**

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Financial Life Focus primarily offers its services based on a fixed annual fee that includes financial planning services and investment management as a single fee as detailed below. The Client will be charged a single combined fee for investment management and financial planning services. The annual fee is calculated by the Advisor by charging one percent (1.00%) of the Client's adjusted gross income plus a percentage of the Client's net worth based on the following tiered schedule:

<b>Client Net Worth</b>	<b>Annual Fee %</b>
\$0 to \$5,000,000	0.50%
\$5,000,000.01 - \$10,000,000	0.25%
Over \$10,000,000	0.10%

The above formula is used to derive a fixed annual, billed in advance of each calendar quarter. The final fee may be increased or decreased based on the complexity of the services to be provided and overall relationship with

the Advisor. The final fee will be mutually agreed through the execution of an investment advisory agreement. Fees will be re-evaluated and mutually agreed every two years from the effective date of the agreement.

Clients are subject to a minimum annual fee of \$3,500. Certain legacy Clients may have a different fee schedule. Financial Life Focus, in its sole discretion, may charge a lesser fee that is reasonable for the Client relationship based upon certain criteria (complexity of the Client's accounts, amount of assets to be managed, related accounts, account composition, etc.). Certain Clients may have fee arrangements where fees are based on assets under management or billed for separate services as detailed in the financial planning fees and investment management fees below.

The Advisor also donates a percentage of the first year advisory fees to one of three charitable organizations: Memorial Sloan Kettering's Cycle For Survival (link to <https://www.cycleforsurvival.org>), Donors Choose (link to: <https://www.donorschoose.org>) or Veterans In Cinema (link to: <https://www.vicf.org>).

#### Financial Planning Fees

For legacy Clients that are under a separate financial planning engagement, Financial Life Focus may charge an hourly fee, fixed project fee, or fixed annual retainer fee for financial planning services. Hourly fees generally range from \$75 to \$500 per hour. Fixed project fees are based on number of hours expected to complete the engagement. Annual retainers are negotiated based on the scope of services to be provided. Annual retainer fees range from \$3,500 to \$20,000, depending upon the level and scope of the services and the professional rendering the financial planning services. Any increase in the annual retainer rate will take effect no more frequently than annually, unless the scope of the planning is changed by mutual consent. If the Client engages Financial Life Focus for additional investment advisory services, Financial Life Focus may offset all or a portion of its fees for those services based upon the amount paid for the financial planning services.

All services are provided only after a Client signs an *Agreement*, which defines all services Financial Life Focus will provide and the fees the Client will pay for those services. Generally, for fixed or hourly engagements the Advisor requires a deposit of one-half of the financial planning fee when the written agreement is signed. The balance is typically due upon delivery of the financial plan or completion of other services. For annual retainer engagements, fees are billed quarterly in advance. Annual retainer fees for the first quarter will be of service are prorated from the date of the agreement to the end of the first quarter. Either party may terminate the agreement by written notice to the other party. Upon termination of the agreement, the balance of any unearned fees will be refunded. If the Client terminates an agreement within five (5) business days of entering it, Financial Life Focus will refund any deposit in full. Generally, the Advisor will suggest to the Client an annual review and/or update of the financial plan and will charge an additional annual fee for any review or update.

#### Investment Management Fees

For legacy Clients that are under a separate investment management engagement, Financial Life Focus provides investment management services for an annual fee based upon a percentage of the market value of the assets being managed by the Advisor. Financial Life Focus' annual fee is prorated and charged quarterly, in advance, based upon the market value of the assets on the last day of the previous quarter. The annual fee varies (between 0.25% and 1.20%) depending upon the market value of the assets under management, as follows:

Portfolio Value	Annual Fee %
Up to \$500,000	1.20%
\$500,001 – \$1,000,000	1.00%
\$1,000,001 – \$2,000,000	0.85%
\$2,000,001 – \$3,000,000	0.70%
\$3,000,001 – \$4,000,000	0.55%
\$4,000,001 – \$5,000,000	0.35%
\$5,000,000 and Over	0.25%

Financial Life Focus, in its sole discretion, may negotiate to charge a lesser management fee based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing Client, account retention, *pro bono* activities, etc.).

#### Retirement Plan Advisory Fees

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 1.20% and are billed quarterly, in advance of each calendar quarter, pursuant to the terms of the retirement plan advisory agreement. Retirement plan advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Fees may be negotiable depending on the size and complexity of the Plan.

Retirement plan advisory fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

#### Fees Charged by Financial Institutions

The Advisor's annual fee is exclusive of, and in addition to any applicable brokerage commissions, transaction fees, and other related costs and expenses, which are incurred by the Client. Financial Life Focus does not receive any portion of these additional charges. The Client will be charged separately by the Custodian for these additional charges.

Clients will incur certain charges imposed by third parties including, but not limited to, charges imposed directly by a mutual fund or ETF in the Client's account[s], which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Additionally, Clients may incur brokerage commissions and transaction fees. Such charges, fees and commissions are exclusive of and in addition to Financial Life Focus' fee.

Financial Life Focus directs BSP to debit the Client's account for the amount of Financial Life Focus' fee and to pay that management fee to the Advisor in accordance with applicable custody rules. BSP has agreed to send a statement to the Client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid to Financial Life Focus. Clients cannot elect to have Financial Life Focus send an invoice for payment of fees.

#### Fees for Management During Partial Quarters of Service

For the initial period of investment management services, the fees are calculated on a pro rata basis.

The *Agreement* between Financial Life Focus and the Client will continue in effect until terminated by either party pursuant to the terms of the *Agreement*. Financial Life Focus' fees are prorated through the date of termination and any remaining balance is charged or refunded to the Client, as appropriate, in a timely manner.

Clients may make additions to and withdrawals from their account[s] at any time, subject to Financial Life Focus' right to terminate an account. Additions may be in cash or securities provided that Financial Life Focus reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client's account[s]. Clients may withdraw account assets on notice to Financial Life Focus, subject to the usual and customary securities settlement procedures. However, Financial Life Focus designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a Client's investment objectives. The Advisor may consult with its Clients about the options and ramifications of transferring securities. However, Clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

If assets are deposited into or withdrawn from an account after the start of a quarter, the fee payable with respect to such assets will not be adjusted or prorated based on the number of days remaining in the quarter.

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

Financial Life Focus does not charge performance-based fees for its investment advisory services. The fees charged by Financial Life Focus are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.



Financial Life Focus does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

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Financial Life Focus generally provides its services to individuals and high net worth individuals. However, the Advisor also may provide advice to pension and profit sharing plans, trusts, estates, charitable organizations, corporations and business entities. The amount of each type of Client is available on Financial Life Focus' Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor.

### **Minimum Account Size**

The Advisor provides its services based on an annual retainer, with a minimum annual fee of \$3,500. The Advisor, in its sole discretion, may reduce this minimum. The Advisor may accept a Client with a lower net worth based upon certain criteria including anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing Client, account retention, and pro bono activities.

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

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

Financial Life Focus applies the principles of Financial Life Planning® as a methodology in an effort to help Clients achieve their preferred future. The Advisor consults with Clients initially and on an ongoing basis to develop a SIS which determines risk tolerance, time horizon and other factors that may impact the Clients' investment needs. The Advisor takes into consideration factors such as retirement, education, estate planning, business planning, investments, insurance, and tax and cash flow needs of the Client. Specifically, as part of this initial analysis, Financial Life Focus speaks to Clients about the following principles:

- **Choice:** Identifying the choices that Clients have in mid-life and beyond, and addressing them in financial strategies, retirement decisions and quality-of-life decisions such as careers, relocation, meaningful use of time, and personal and professional growth.
- **Consequences of options:** Every financial decision Clients make have consequences - Financial Life Planning® seeks to help Clients view them as a whole, functioning part of their personal, professional and financial development over time.
- **Self-direction:** Self-reliance and personal responsibility are two overarching themes in life planning.
- **Intentionality:** Life planning is not an accidental occurrence. It is an intentional process. At times, the intent needs definition, direction and clarification. Financial Life Focus works with Clients to help them find that direction.
- **Empowerment:** The Financial Life Planning® process is designed with the goal of empowering individuals to make good decisions for themselves and their loved ones. At times, individuals need to be encouraged to recognize that they have the power to design their own future. This is closely aligned to being self-directed and intentional in one's efforts.
- **Holistic Planning:** Life planning is holistic. Financial security must be made to serve and reinforce Client's personal values, visions and aspirations for the future.
- **Integrity in Evaluation:** The intention of life planning is one of candor. While keeping welfare a top priority, Financial Life Focus will help Clients make an honest and open assessment of their financial situation and options for the future.
- **Personal Attention:** Life planning is focused on the individual. Therefore, it is highly personal. No two individuals are the same. The uniqueness of each individual is valued on a personal level.



As part of completing the SIS, Financial Life Focus primarily recommends that Clients allocate their investment management assets among mutual funds and ETFs.

After completion, Financial Life Focus then provides the Client's investment strategy, trade restrictions and target allocation to BSP to implement the plan. BSP is an unaffiliated SEC registered investment adviser that provides an asset allocation and investment account management platform and associated administrative services to Financial Life Focus and its Clients. Financial Life Focus sets an asset allocation using BSP modeling software. BSP then implements the allocation communicated to them by Financial Life Focus. The asset allocation program designates specified percentages of assets within several asset classes with the intent of creating a diversified investment portfolio. The assets are managed by either DFA Dimensional Fund Advisors ("DFA") or Structured Assets ("SA"), according to a rules-based passive management approach. Moreover, certain securities transactions for Clients' accounts may be made with Loring Ward Securities Inc., a securities broker-dealer and member of SIPC and FINRA. Clients will be provided with a copy of BSP's written disclosure statement in addition to this Disclosure Brochure.

## **B. Risks of Loss**

### Mutual Funds and ETFs

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees. The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more).

### Market Risks

The profitability of a portion of Financial Life Focus' recommendations may depend to a great extent upon correctly assessing the future course of price movements of stocks and bonds. There can be no assurance that Financial Life Focus will be able to predict those price movements accurately.

### General Risk of Loss

Investing in securities involves the risk of loss. Clients should be prepared to bear such loss.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

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Financial Life Focus is required to disclose the facts of any legal or disciplinary events that are material to a Client's evaluation of its advisory business or the integrity of management. Financial Life Focus does not have any required disclosures to this Item.

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

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### WCCF Consulting and Development LLC

Mr. Kay is the President of WCCF Consulting and Development LLC, where he works on creating content for publication and paid speaking engagements.

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

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Financial Life Focus and its Supervised Persons are permitted to buy or sell securities that it also recommends to Clients consistent with Financial Life Focus' policies and procedures.

Financial Life Focus has adopted a Code of Ethics that sets forth the standards of conduct expected of its Supervised Persons and requires compliance with applicable securities laws ("Code of Ethics"). In accordance with Section 204A of the Investment Advisers Act of 1940 (the "Advisers Act"), its Code of Ethics contains written policies reasonably designed to prevent the unlawful use of material non-public information by Financial Life Focus or any of its Supervised Persons. The Code of Ethics also requires that certain of Financial Life Focus' Supervised Persons (called "Access Persons") report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

Unless specifically permitted in Financial Life Focus' Code of Ethics, none of Financial Life Focus' Access Persons may implement for themselves or for their immediate family (i.e., spouse, minor children, and adults living in the same household as the Access Person) any transactions in a security which is being actively purchased or sold, or is being considered for purchase or sale, on behalf of any of Financial Life Focus' Clients.

When Financial Life Focus is purchasing or considering for purchase any security on behalf of a Client, no Access Person may implement a transaction in that security prior to the completion of the purchase or until a decision has been made not to purchase such security. Similarly, when Financial Life Focus is selling or considering the sale of any security on behalf of a Client, no Access Person may implement a transaction in that security prior to the completion of the sale or until a decision has been made not to sell such security. These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Clients and prospective Clients may contact Financial Life Focus to request a copy of its Code of Ethics.

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

Financial Life Focus does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Financial Life Focus to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Financial Life Focus does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Financial Life Focus does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a broker-dealer/custodian not recommended by Financial Life Focus. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Financial Life Focus may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.

The Advisor typically recommends that Clients establish accounts with TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade") or with Charles Schwab & Co., Inc. ("Schwab"), both of which are FINRA-registered broker-dealers and members SIPC. TD Ameritrade and Schwab are independent and unaffiliated SEC-registered broker-dealers. TD Ameritrade and Schwab offers to independent investment Advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. Please see Item 14 below. Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Financial Life Focus does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - Financial Life Focus does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Financial Life Focus will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Financial Life Focus will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Financial Life Focus will execute its transactions through the Custodian as authorized by the Client.

Financial Life Focus may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

## **Item 13 – Review of Accounts**

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For those Clients to whom Financial Life Focus provides investment management services, Financial Life Focus monitors those portfolios as part of an ongoing process while regular account reviews are conducted on at least a quarterly basis. For those Clients to whom Financial Life Focus provides financial planning services, reviews are conducted on an "as needed" basis. Such reviews are conducted by one of Financial Life Focus' investment adviser representatives. All investment advisory Clients are encouraged to discuss their needs, goals, and objectives with Financial Life Focus and to keep Financial Life Focus informed of any changes thereto. Financial Life Focus contacts ongoing investment advisory Clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the Client's financial situation and/or investment objectives. In addition, the Advisor conducts periodic Client meetings and/or conference calls to review Clients' financial pictures.

Unless otherwise agreed upon, Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or Custodian for the Client accounts.

Those Clients to whom Financial Life Focus provides financial planning services will receive reports from Financial Life Focus summarizing its analysis and conclusions as requested by the Client or otherwise agreed to in writing by Financial Life Focus.

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

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Financial Life Focus may receive referrals from other professionals and may refer Clients to other professionals as necessary and appropriate. Financial Life Focus does not compensate anyone for Client referrals nor receive any compensation.

### Participation in Institutional Advisor Platform

As disclosed under Item 12, above, the Advisor participates in TD Ameritrade's institutional customer program and the Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between the Advisor's participation in the program and the investment advice it gives to its Clients, although the Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving the Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by the Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit the Advisor but may not benefit its Client accounts. These products or services may assist the Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help the Advisor manage and further develop its business enterprise. The benefits received by the Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, the Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by the Advisor or its related persons in and of itself creates a conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

### Participation in Institutional Advisor Platform

Financial Life Focus has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like Financial Life Focus. As a registered investment advisor participating on the Schwab Advisor Services platform, Financial Life Focus receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

*Services that Benefit the Client* – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

*Services that May Indirectly Benefit the Client* – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

*Services that May Only Benefit the Advisor* – Schwab also offers other services and financial support to Financial Life Focus that may not benefit the Client, including: educational conferences and events, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a conflict of interest. Financial Life Focus believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

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#### **Item 15 – Custody**

Financial Life Focus outsources billing to BSP who will debit the Client's account[s] for the amount of Financial Life Focus' fee and pay that management fee to the Advisor in accordance with applicable custody rules. BSP has agreed to send a statement to the Client, at least quarterly, indicating all amounts disbursed from the account[s] including the amount of management fees paid to Financial Life Focus.

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

Financial Life Focus is required to disclose if it accepts discretionary authority to manage securities accounts on behalf of Clients. Financial Life Focus is considered to exercise investment discretion over a Client's account if it can implement transactions for the Client without first having to seek the Client's consent. Financial Life Focus does not exercise discretion on behalf of Clients.

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

Financial Life Focus is required to disclose if it accepts authority to vote Client securities. Financial Life Focus does not vote Client securities on behalf of its Clients. Clients receive proxies directly from the *Financial Institutions*.

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

Financial Life Focus does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance and therefore has no disclosures to make with respect to this Item.



## **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Michael F. Kay, CFP®**  
**President and Chief Compliance Officer**

**Effective: March 22, 2020**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Michael F. Kay, CFP® (CRD# **1420183**) in addition to the information contained in the Financial Life Focus, LLC (“Financial Life Focus” or the “Advisor” CRD #152904) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or the Financial Life Focus Disclosure Brochure, please contact the Advisor at (973) 533-0666 or by email at [pnicita@financial-lifefocus.com](mailto:pnicita@financial-lifefocus.com).

Additional information about Michael F. Kay is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## Item 2 – Educational Background and Business Experience

Michael F. Kay, born in 1954, is dedicated to advising Clients of Financial Life Focus as the President and Chief Compliance Officer. Mr. Kay earned a Bachelors Degree from Adelphi University in 1974. Additional information regarding Mr. Kay's employment history is included below.

### Employment History:

President and Chief Compliance Officer, Financial Life Focus, LLC	10/2001 to Present
Teacher, New York University	01/2002 to 09/2011
Agent, Mid Atlantic Resource Group / Mid Atlantic Benefit Strategies	10/2002 to 06/2010
Registered Representative, Securian Financial Services Inc.	10/1986 to 06/2010
Agent, Mid Atlantic Insurance Solutions	01/2003 to 01/2010

### Professional Designation: Certified Financial Planner ("CFP®")

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. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

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, administered in 10 hours over a two-day period, 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.

### **Item 3 – Disciplinary Information**

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Securities laws require an advisor to disclose in a ten-year period any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. , ***There are no legal, civil or disciplinary events to disclose regarding Mr. Kay.***

However, the Advisor does encourage you to independently view the background of Mr. Kay on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1420183.

### **Item 4 – Other Business Activities**

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Mr. Kay is the President of WCCF Consulting and Development LLC, where he works on creating content for publication and paid speaking engagements.

### **Item 5 – Additional Compensation**

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Mr. Kay has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

### **Item 6 – Supervision**

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Mr. Kay serves as the President and Chief Compliance Officer of Financial Life Focus. Mr. Kay can be reached at (973) 533-0666.

Financial Life Focus has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients. Further, Financial Life Focus is subject to regulatory oversight by various agencies. These agencies require registration by Financial Life Focus and its Supervised Persons. As a registered entity, Financial Life Focus is subject to examinations by regulators, which may be announced or unannounced. Financial Life Focus is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Jeremy D. Levinn, CFP®  
Financial Advisor**

**Effective: March 22, 2020**

This Form ADV 2B (Brochure Supplement”) provides information about the background and qualifications of Jeremy D. Levinn (CRD# **5400425**) in addition to the information contained in the Financial Life Focus, LLC (“Financial Life Focus” or the “Advisor”) (CRD # 152904) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Financial Life Focus Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (973) 533-0666 or by email at [pnicta@financial-lifefocus.com](mailto:pnicta@financial-lifefocus.com).

Additional information about Mr. Levinn is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

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Jeremy D. Levinn, born in 1982, is dedicated to advising Clients of Financial Life Focus as a Financial Advisor. Mr. Levinn earned a Certificate in Financial Planning from New York University's School of Continuing and Professional Studies in 2006. Mr. Levinn also earned a Bachelor of Arts in Government from Wesleyan University in 2004. Additional information regarding Mr. Levinn's employment history is included below.

### Employment History:

Financial Advisor, Financial Life Focus, LLC	09/2012 to Present
Personal Trainer, Equinox	12/2008 to 08/2011
Advisor, L.J. Altfest & Co., Inc.	10/2006 to 03/2008

### Professional Designation: Certified Financial Planner ("CFP®")

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. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

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, administered in 10 hours over a two-day period, 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.

### **Item 3 – Disciplinary Information**

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Securities laws require an advisor to disclose in a ten-year period any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***There are no legal, civil or disciplinary events to disclose regarding Mr. Levinn.***

However, the Advisor does encourage you to independently view the background of Mr. Levinn on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5400425.

### **Item 4 – Other Business Activities**

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Mr. Levinn is dedicated to the investment advisory activities at Financial Life Focus. Mr. Levinn does not have any other business activities.

### **Item 5 – Additional Compensation**

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Mr. Levinn is dedicated to the investment advisory activities of Financial Life Focus. Mr. Levinn does not receive any additional forms of compensation.

### **Item 6 – Supervision**

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Mr. Levinn serves as a Financial Advisor with Financial Life Focus and is supervised by Michael Kay, the Chief Compliance Officer. Mr. Kay can be reached at (973) 533-0666.

Financial Life Focus has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients. Further, Financial Life Focus is subject to regulatory oversight by various agencies. These agencies require registration by Financial Life Focus and its Supervised Persons. As a registered entity, Financial Life Focus is subject to examinations by regulators, which may be announced or unannounced. Financial Life Focus is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Olga L. Raykhelson, CFP®**  
**Financial Advisor**

**Effective: March 22, 2020**

This Form ADV 2B (Brochure Supplement”) provides information about the background and qualifications of Olga L. Raykhelson (CRD# **1995046**) in addition to the information contained in the Financial Life Focus, LLC (“Financial Life Focus” or the “Advisor” CRD #152904) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or the Financial Life Focus Disclosure Brochure, please contact the Advisor at (973) 533-0666 or by email at [pnicta@financial-lifefocus.com](mailto:pnicta@financial-lifefocus.com).

Additional information about Olga L. Raykhelson is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Olga L. Raykhelson, born in 1967, is dedicated to advising Clients of Financial Life Focus as a Financial Advisor. Ms. Raykhelson earned a Bachelors Degree from State University of New York in 1988. Ms. Raykhelson also earned a Master of Business Administration in Investment Finance from Baruch College in 1993. Additional information regarding Ms. Raykhelson's employment history is included below.

### Employment History:

Financial Advisor, Financial Life Focus, LLC	06/2010 to Present
Financial Advisor, Securian Financial Services, Inc.	05/1997 to 06/2010

### Professional Designation: Certified Financial Planner ("CFP®")

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. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

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, administered in 10 hours over a two-day period, 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.

### **Item 3 – Disciplinary Information**

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Securities laws require an advisor to disclose in a ten-year period any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***There are no legal, civil or disciplinary events to disclose regarding Ms. Raykhelson.***

However, the Advisor does encourage you to independently view the background of Ms. Raykhelson on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 199504.

### **Item 4 – Other Business Activities**

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#### **Real Estate**

Ms. Raykhelson is a licensed real estate agent for The Corcoran Group, based in New York. Ms. Raykhelson spends less than 10% of her time during business hours.

### **Item 5 – Additional Compensation**

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Ms. Raykhelson has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

### **Item 6 – Supervision**

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Ms. Raykhelson serves as a Financial Advisor with Financial Life Focus and is supervised by Michael Kay, the Chief Compliance Officer. Mr. Kay can be reached at (973) 533-0666.

Financial Life Focus has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients. Further, Financial Life Focus is subject to regulatory oversight by various agencies. These agencies require registration by Financial Life Focus and its Supervised Persons. As a registered entity, Financial Life Focus is subject to examinations by regulators, which may be announced or unannounced. Financial Life Focus is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.





## **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Hugues G. Rivard, CFP®**  
**Financial Advisor**

**Effective: March 22, 2020**

This Form ADV 2B (Brochure Supplement) provides information about the background and qualifications of Hugues G. Rivard (CRD# **5282684**) in addition to the information contained in the Financial Life Focus, LLC (“Financial Life Focus” or the “Advisor” CRD #152904) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or the Financial Life Focus Disclosure Brochure, please contact the Advisor at (973) 533-0666 or by email at [pnicta@financial-lifefocus.com](mailto:pnicta@financial-lifefocus.com).

Additional information about Hugues G. Rivard is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

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Hugues G. Rivard, born in 1968, is dedicated to advising Clients of Financial Life Focus as a Financial Advisor. Mr. Rivard earned a Bachelor of Arts in Mathematical Economics from Colgate University in 1991. Mr. Rivard also earned a Master of Business Administration in Finance and Organizational Behavior from Northwestern University in 1995. Additional information regarding Mr. Rivard's employment history is included below.

### Employment History:

Financial Advisor, Financial Life Focus, LLC	06/2010 to Present
Agent, Mid Atlantic Resource Group	01/2007 to 06/2010
Registered Representative, Securian Financial Services, Inc.	01/2007 to 06/2010
Financial Advisor, Assante / Loring Ward	07/2000 to 01/2007

### Professional Designation: Certified Financial Planner ("CFP®")

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. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

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, administered in 10 hours over a two-day period, 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.

### **Item 3 – Disciplinary Information**

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Securities laws require an advisor to disclose in a ten-year period any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***There are no legal, civil or disciplinary events to disclose regarding Mr. Rivard.***

However, the Advisor does encourage you to independently view the background of Mr. Rivard on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5282684.

### **Item 4 – Other Business Activities**

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Mr. Rivard is dedicated to the investment advisory activities at Financial Life Focus. Mr. Rivard does not have any other business activities.

### **Item 5 – Additional Compensation**

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Mr. Rivard is dedicated to the investment advisory activities at Financial Life Focus. Mr. Rivard does not receive any additional forms of compensation.

### **Item 6 – Supervision**

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Mr. Rivard serves as a Financial Advisor with Financial Life Focus and is supervised by Michael Kay, the Chief Compliance Officer. Mr. Kay can be reached at (973) 533-0666.

Financial Life Focus has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients. Further, Financial Life Focus is subject to regulatory oversight by various agencies. These agencies require registration by Financial Life Focus and its Supervised Persons. As a registered entity, Financial Life Focus is subject to examinations by regulators, which may be announced or unannounced. Financial Life Focus is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Rowland P. Pepito, CFP®**  
**Senior Financial Advisor**

**Effective: March 22, 2020**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Rowland P. Pepito, CFP® (CRD# 4429686) in addition to the information contained in the Financial Life Focus, LLC (“Financial Life Focus” or the “Advisor”, CRD# 152904) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Financial Life Focus Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (973) 533-0666 or by email at [pnicita@financial-lifefocus.com](mailto:pnicita@financial-lifefocus.com).

Additional information about Mr. Pepito is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4429686.

## Item 2 – Educational Background and Business Experience

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Rowland P. Pepito, CFP® born in 1967, is dedicated to advising Clients of Financial Life Focus as a Senior Financial Advisor. Mr. Pepito earned a Bachelors in Finance from Thomas Edison State University. Mr. Pepito also earned a Bachelors Economics from the University of San Carlos. Additional information regarding Mr. Pepito's employment history is included below.

### Employment History:

Senior Financial Advisor, Financial Life Focus, LLC	04/2019 to Present
Contract Financial Planning Consultant, Northwestern Mutual	12/2018 to 04/2019
Contract Financial Planner, Ernst and Young	08/2018 to 12/2018
Grad Student, Graduate Student	10/2017 to 08/2018
VP, Financial Consultant, Fidelity Investments	08/2016 to 09/2017
Wealth Manager, USAA Wealth Management	07/2013 to 08/2016
Financial Consultant, TIAA-CREF	05/2012 to 07/2013
Relationship Manager, Merrill Lynch	04/2011 to 05/2012

### Certified Financial Planner ("CFP®")

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. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

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, administered in 10 hours over a two-day period, 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.

### **Item 3 – Disciplinary Information**

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Pepito.*** Mr. Pepito has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Pepito.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Pepito.***

However, the Advisor does encourage you to independently view the background of Mr. Pepito on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4429686.

### **Item 4 – Other Business Activities**

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Mr. Pepito is dedicated to the investment advisory activities of Financial Life Focus's Clients. Mr. Pepito does not have any other business activities.

### **Item 5 – Additional Compensation**

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Mr. Pepito is dedicated to the investment advisory activities of Financial Life Focus's Clients. Mr. Pepito does not receive any additional forms of compensation.

### **Item 6 – Supervision**

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Mr. Pepito serves as a Senior Financial Advisor of Financial Life Focus and is supervised by Michael Kay, the Chief Compliance Officer. Mr. Kay can be reached at (973) 533-0666.

Financial Life Focus has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Financial Life Focus. Further, Financial Life Focus is subject to regulatory oversight by various agencies. These agencies require registration by Financial Life Focus and its Supervised Persons. As a registered entity, Financial Life Focus is subject to examinations by regulators, which may be announced or unannounced. Financial Life Focus is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

Effective Date: March 22, 2020

### Our Commitment to You

Financial Life Focus, LLC ("Financial Life Focus" or the "Advisor") is committed to safeguarding the use of personal information of our Client's (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we will do everything that we can to maintain that trust. Financial Life Focus (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Financial Life Focus does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.



### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Financial Life Focus does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Financial Life Focus or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> Financial Life Focus does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of the Advisor's current Privacy Policy by contacting the Advisor at (973) 533-0666 or via email at [pnicta@financial-lifefocus.com](mailto:pnicta@financial-lifefocus.com).