

Creative Financial Designs, Inc.

Form ADV Part 2A
Disclosure Brochure

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Creative Financial Designs, Inc.
2704 South Goyer Road
Kokomo, IN 46902
800.745.7776
765.453.9600
www.creativefinancialdesigns.com

This brochure provides information about the qualifications and business practices of Creative Financial Designs, Inc. If you have any questions about the contents of this brochure, please contact us at 765.453.9600 and/or www.creativefinancialdesigns.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Creative Financial Designs, Inc. is a Registered Investment Adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Creative Financial Designs, Inc. is available on the SEC's website at www.adviserinfo.sec.gov. (CRD# 109032/SEC#: 801-60153)

ITEM 2: MATERIAL CHANGES

The Material Changes section of this Brochure will be updated annually, or as information herein becomes materially inaccurate. The following information consists of the material changes made by the firm since its last updating amendment, which was dated March 30, 2020.

Designs added language to this Brochure disclosing actions relating to the COVID-19 global pandemic and its acceptance of benefits related to the Paycheck Protection Program administered by the SBA.

Clients may request a complete copy of our ADV Brochure and supplements by reaching out to the firm by phone (765-453-9600) or by email (managedaccounts@creativefinancialdesigns.com). The firm will provide you with a new brochure at any time without charge.

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ITEM 4: ADVISORY BUSINESS

Firm Description

Creative Financial Designs, Inc. (hereinafter, “the firm” or “Creative”) is a corporation formed according to the laws of the State of Indiana and an investment advisor firm registered with the SEC in 1982. The firm provides a variety of services through its investment adviser representatives. Creative is a privately owned SEC-registered investment advisor.

Ownership

Creative is privately owned by Brent Owens Family Trust, which owns approximately twenty-five percent, and the Mick Owens Family Trust, which owns approximately fifty-six percent. The current trustee of the Brent Owens Family Trust is Brent Owens, who is also the President of the firm. The current trustees of the Mick Owens Family Trust are Mick Owens and Kathy Owens. Mick Owens serves as an Investment Adviser Representative of the firm.

The Mick Owens Family Trust, whose beneficial owners are the firm’s founder, Mick Owens and Kathy Owens, and the Brent Owens Family Trust, whose beneficial owner is Brent Owens, the President of Creative, are also significant stockholders of a related company, cfd Investments, Inc., an SEC-registered broker/dealer and member of FINRA. (See Item 10: Other Financial Industry Activities and Affiliations). Mick Owens is also the principal owner of several other companies founded to complement the comprehensive financial planning and investment management services of Creative Financial Designs, Inc. Those companies include cfd Realty [owned by Mick’s wife, Kathy Owens], and cfd Insurance Planners [a life and health insurance agency].

Amount of Assets Managed By Our Firm

As of the fiscal year ending December 31, 2019, the amount of client assets the firm managed totaled \$1,400,933,857. Of that total, \$1,053,976,831 was managed on a discretionary basis and \$346,957,026 was on a non-discretionary basis.

Investment Advisory Services Provided

Creative Financial Designs offers discretionary and non-discretionary investment management services and financial planning and consulting services.

Managed & Advisory Account Services

The firm’s management & advisory services are comprised of three distinct service platforms: Brokerage Management, Self-Directed Retirement Management, and

Variable Annuity Management. Creative also offers a non-discretionary brokerage and annuity advisory service known as the “Fee-in-Lieu” (FIL) program.

Brokerage Management

Descriptions and Account Minimums

Under the Brokerage Management platform, the firm manages a client’s brokerage account according to the client’s selections of the investment strategy and portfolio objective, based on information provided to the firm by the client. This information typically includes, without limitation, a client’s risk tolerance, time horizon, investment goals, and general financial information. Client assets are generally invested in securities such as, common and/or preferred stocks, bonds, other fixed income securities, mutual funds, exchange traded funds, options on any of the foregoing, certificates of deposit and money market funds or other cash-like investments.

The firm primarily uses and has developed asset-class and sector based model allocations based on research with other professional management models such as Morningstar (formerly Ibbotson), JP Morgan, Goldman Sachs, Blackrock, Northern Trust, etc. Our models generally fall into five categories based on perceived risk: Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive referred to as Portfolio Objectives. Available investments are categorized according to the model guidelines and overall asset allocation is determined taking those categorizations, and investment and portfolio research into effect, in arriving at the respective model portfolio allocations. The Sector Cycle Strategy diversifies among individual sectors for the equity portion of the portfolio and not necessarily among asset classes.

For management of the model portfolio, the client can select from several “investment strategies”. They are as follows:

- American Funds Focused
-minimum \$25k account size
- Biblical Faith Values -- CFD4
-minimum \$10k account size
- Biblical Faith Values Combination
-minimum \$25k account size
- Biblical Faith Values Funds
-minimum \$25k account size
- Biblical Faith Values Individual Equities
-minimum \$25k account size

- Biblical Faith Values Inspire Focused
-minimum \$25k account size
- Biblical Faith Values Timothy Focused
-minimum \$25k account size
- CFD4
-minimum \$10k account size
- Combination
-minimum \$25k account size
- Exchange Traded Funds
-minimum \$25k account size
- Fundamental Opportunities
-minimum \$25k account size
- Funds
-minimum \$25k account size
- Income Strategy
-minimum \$100k account size
- Tax-Wise
-minimum \$100k account size

For management that does not utilize a model portfolio based on Creative's traditional asset allocation models, the following option is available:

- Sector Cycle Strategy
-minimum \$25k account size

Creative also provides, from time to time, customized managed account services whereby management & advisory services are provided apart from the strategies described above. These are permitted and approved by Creative's Management Team on a case-by-case basis.

For all the previously mentioned investment strategies, client accounts must be established with a registered broker/dealer. These services are available through accounts established at cfd Investments, Inc. [through one of its clearing arrangements: FCCS (Fidelity Custody and Clearing Solutions) f/k/a NFS (National Financial Services) or RBC CS (RBC Correspondent Services)]. These services are also available through accounts established at TD Ameritrade, or such other broker/dealer as selected by the client and approved by the management of

Creative Financial Designs, Inc. Please note that the charges applied by the broker/dealer relating to account maintenance and services are not generally described herein, and clients are encouraged to review statements and related information carefully to determine other fees or charges that apply and that are assessed by their broker/dealer and/or associated clearing firms. To the extent that cfd investments is selected as the client's broker/dealer, cfd Investments, Inc. will receive compensation for services provided, and such compensation shall be distinct from the advisory fees described herein.

If a client's managed brokerage account falls below the account minimum, the firm reserves the authority to change the chosen strategy to one that is more conducive to the management of assets at that level, or to discontinue management in its entirety (e.g. client had \$80k in the combination strategy, and then withdrew \$65k from the account. Creative could move the assets to the CFD4 strategy or some other suitable strategy or terminate management on the account). Creative reviews accounts for adherence to the account minimum requirements at the end of each calendar year or as distributions happen, or at such other time as Creative may desire. Upon review, Creative will make strategy changes accordingly. Clients can choose to change their strategies at any time, by providing written notice to Creative, as long as the client's investment in the strategy meets the stated minimums for the strategy selected.

Client Limitations on Investments

Unaffiliated custodians hold all client securities with Creative. (By way of clarification, assets maintained in accounts with cfd Investments, Inc., an affiliate of Designs, are maintained at custodians that are not affiliated with Creative or cfd Investments, Inc.) Securities are held in the client's name, or the name of the applicable custodian or trust, in the case of qualified accounts. Clients may request to place reasonable restrictions on certain aspects of the management of their accounts. For instance, clients may elect to retain certain securities in their managed account and not have those assets be subject to sale in the course of Creative's management of the account. Clients may also elect, in some circumstances, to have capital gains "distributed" to be taken over a specified period of time. Creative reserves the right to charge its management fee inclusive of such assets because of the additional work and considerations that must be afforded in accommodating such client-imposed restrictions. The client can move any of the said assets to another non-managed account if desired to avoid additional fees. Creative may, at times, allow additional special requests of the client regarding the management of the client's account.

American Funds Focused -- Description

The American Funds Focused investment strategy is a diversified strategy focusing on the use of American Funds mutual funds as the base of the diversified portfolio. The strategy also uses ETF's and potentially other mutual funds to fill in

the completed allocation helping fully diversify and add additional asset classes that American Funds may lack or that the management team feels is better to use in place of an American Funds mutual fund. Five investment objective portfolios are available for the client to choose from (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive) and are modeled after Creative Financial Designs' overall diversified asset class models.

Biblical Faith Values – CFD4 – Description

Under the Biblical Faith Values investment strategy, Creative utilizes certain software and independent third party asset screening programs and communicates with fund companies in order to limit investments in companies that engage in certain industries or support certain activities or lifestyles, or otherwise contribute to or endorse such industries or activities. The firm generally endeavors to exclude investments in companies that engage in or participate in or support industries or lifestyles relating to gambling, tobacco, alcohol, pornography, abortion, non-family lifestyles and other factors traditionally considered averse to Biblical standards.

Due to a limited pool of available investments in certain management strategies, governance requirements, etc., it is not always possible to exclude all investments that might violate some of the standards that are described in the prior paragraph. The firm does not make any claim that the investments in the model will fully exclude any and all companies that could be excluded based on the criteria above, however, this strategy should substantially reflect Biblical Values, and will otherwise attempt to follow the models established by Creative Financial Designs.

The Biblical Faith Values – CFD4 investment strategy attempts to invest in accordance with the Biblical Faith Values limitations described above, and to create a likely simpler diversified portfolio based on mutual fund & ETF positions. This strategy likely uses up to four asset classes (may be less or more given the portfolio objective selected) and holding perhaps as few as four investments, however, the firm's Management reserves the right to increase and decrease each, as it sees fit. Additional portfolio risk in this strategy occurs with less diversification and this strategy can be more volatile than other further diversified strategies. Five investment objective portfolios are available for the client to choose from (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive) and are loosely modeled after Creative Financial Designs' overall diversified asset class models.

Biblical Faith Values – Combination -- Description

Under this Biblical Faith Values investment strategy, Creative utilizes certain software and independent third party asset screening programs and communicates with fund companies in order to limit investments in companies that engage in certain industries or support certain activities or lifestyles, or otherwise

contribute to or endorse such industries or activities. We generally endeavor to exclude investment companies that engage in or participate in or support industries or lifestyles relating to gambling, tobacco, alcohol, pornography, abortion, non-family lifestyles and other factors traditionally considered adverse to Biblical standards.

Due to a limited pool of available investments in certain management strategies, governance requirements, etc., it is not always possible to exclude all investments that might violate some of the standards that are described in the prior paragraph. The firm does not make any claim that the investments in the model will fully exclude any companies that could be excluded based on the criteria above. Instead, this strategy should substantially reflect Biblical Values, and will otherwise attempt to follow the models established by Creative Financial Designs.

The Biblical Faith Values – Combination investment strategy attempts to invest in accordance with the Biblical Faith Values limitations described above, and to create a diversified portfolio based on a combination of mutual funds, ETF's, and individual equity positions. Five investment objective portfolios are available for the client to choose from (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive) and are modeled after Creative Financial Designs' overall diversified asset class models.

Biblical Faith Values – Funds – Description

Under the Biblical Faith Values investment strategy, Creative utilizes certain software and independent third party asset screening programs and communicates with fund companies in order to limit investments in companies that engage in certain industries or support certain activities or lifestyles, or otherwise contribute to or endorse such industries or activities. The firm generally endeavors to exclude investment companies that engage in or participate in or support industries or lifestyles relating to gambling, tobacco, alcohol, pornography, abortion, non-family lifestyles and other factors traditionally considered adverse to Biblical standards.

Due to a limited pool of available investments in certain management strategies, governance requirements, etc., it is not always possible to exclude all investments that might violate some of the standards that are described in the prior paragraph. The firm does not make any claim that the investments in the model will fully exclude any companies that could be excluded based on the criteria above. Instead, this strategy should substantially reflect Biblical Values, and will otherwise attempt to follow the models established by Creative Financial Designs.

The Biblical Faith Values – Funds investment strategy attempts to invest in accordance with the Biblical Faith Values limitations described above, and to create a diversified portfolio based on mutual funds & ETF positions. Five investment objective portfolios are available for the client to choose from

(Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive) and are modeled after Creative Financial Designs' overall diversified asset class models.

Biblical Faith Values – Individual Equities -- Description

Under the Biblical Faith Values investment strategy, Creative utilizes certain software and independent third party asset screening programs and communicates with fund companies in order to limit investments in the stock of companies that engage in certain industries or support certain activities or lifestyles, or otherwise contribute to or endorse such industries or activities. The firm generally endeavors to exclude investment companies that engage in or participate in or support industries or lifestyles relating to gambling, tobacco, alcohol, pornography, abortion, non-family lifestyles and other factors traditionally considered averse to Biblical standards.

Due to a limited pool of available investments in certain management strategies, governance requirements, etc., it is not always possible to exclude all investments that might violate some of the standards that are described in the prior paragraph. The firm does not make any claim that the investments in the model will fully exclude any and all companies that could be excluded based on the criteria above. Instead, this strategy should substantially reflect Biblical Values, and will otherwise attempt to follow the models established by Creative Financial Designs.

The Biblical Faith Values – Individual Equities investment strategy attempts to invest in accordance with the Biblical Faith Values limitations described above, and to create a diversified portfolio with a goal of majority individual equity positions. Mutual funds or ETF's may also be used especially as investments in the fixed income, small cap and international portions of the portfolios. Five investment objective portfolios are available for the client to choose from (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive) and are modeled after Creative Financial Designs' overall diversified asset class models.

Biblical Faith Values – Inspire Focused -- Description

Under the Biblical Faith Values investment strategy, Creative utilizes certain software and independent third party asset screening programs and communicates with fund companies in order to limit investments in the stock of companies that engage in certain industries or support certain activities or lifestyles, or otherwise contribute to or endorse such industries or activities. The firm generally endeavors to exclude investment companies that engage in or participate in or support industries or lifestyles relating to gambling, tobacco, alcohol, pornography, abortion, non-family lifestyles and other factors traditionally considered averse to Biblical standards.

Due to a limited pool of available investments in certain management strategies, governance requirements, etc., it is not always possible to exclude all investments that might violate some of the standards that are described in the prior paragraph. The firm does not make any claim that the investments in the model will fully exclude any companies that could be excluded based on the criteria above. Instead, this strategy should substantially reflect Biblical Values, and will otherwise attempt to follow the models established by Creative Financial Designs.

The Inspire Focused investment strategy is centered on using the Inspire companies' ETF's. To date, Inspire has created five index ETF's (with plans to increase their ETF offerings) that attempt to filter Biblically. The Inspire ETF's are likely a sizeable portion of the portfolio and Creative's Management Team uses other mutual funds and possibly ETF's also filtered to make up the entire portfolio allocation to maximize diversification. The Inspire Focused investment strategy will have additional market risks in that the ETF's are not always highly traded and thus have less volume as other ETF's might have. This creates additional risk when buying and selling these ETF's in larger amounts. Five investment objective portfolios are available for the client to choose from (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive) and are modeled after Creative Financial Designs' overall diversified asset class models.

Biblical Faith Values – Timothy Focused -- Description

Under the Biblical Faith Values investment strategy, Creative utilizes certain software and independent third party asset screening programs and communicates with fund companies in order to limit investments in the stock of companies that engage in certain industries or support certain activities or lifestyles, or otherwise contribute to or endorse such industries or activities. The firm generally endeavors to exclude investment companies that engage in or participate in or support industries or lifestyles relating to gambling, tobacco, alcohol, pornography, abortion, non-family lifestyles and other factors traditionally considered averse to Biblical standards.

Due to a limited pool of available investments in certain management strategies, governance requirements, etc., it is not always possible to exclude all investments that might violate some of the standards that are described in the prior paragraph. The firm does not make any claim that the investments in the model will fully exclude any companies that could be excluded based on the criteria above. Instead, this strategy should substantially reflect Biblical Values, and will otherwise attempt to follow the models established by Creative Financial Designs.

The Timothy Focused investment strategy is centered on using the Timothy Plan Mutual Funds and ETF's. The portfolios in this strategy will likely include a larger amount of Timothy investments along with other ETF's and/or mutual funds also filtered to make up the entire portfolio allocation to help further diversify portfolios. Timothy investments, especially the ETF's will have additional market risks in that

the ETF's are not always highly traded and thus have less volume as other ETF's might have. This creates additional risk when buying and selling these ETF's in larger amounts. Five investment objective portfolios are available for the client to choose from (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive) and are modeled after Creative Financial Designs' overall diversified asset class models.

CFD4 -- Description

The CFD4 brokerage investment strategy uses mutual funds and ETF's likely using as few or fewer than four asset classes (may be less or more given the portfolio objective selected) and holding perhaps as few as four investments. Creative's Management reserves the right to increase and decrease each however. Additional portfolio risk in this strategy occurs with less diversification and this strategy can be more volatile than other further diversified strategies. Five investment objective portfolios are available for the client to choose from (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive) and are loosely modeled after Creative Financial Designs' overall diversified asset class models.

Combination -- Description

The Combination investment strategy focuses on maximum diversification by using a combination of mutual funds, ETF's, individual equities, bonds, etc. to build the investment portfolios. Creative's Management Team selects the investments from the said categories based on their research. Portfolios could fluctuate from investment vehicles, however, will contain several at a time. Five investment objective portfolios are available for the client to choose from (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive) and are modeled after Creative Financial Designs' overall diversified asset class models.

Exchange Traded Funds (ETF) – Description

The ETF investment strategy is focused on using Exchange Traded Funds to allocate within the given investment portfolios. Creative Investment Team may add mutual funds to complete the allocation if asset classes are not available or do not meet the Team's requirements. ETF's are normally a passive investment holding with potentially lower than average internal expenses compared to actively traded mutual funds. Passive investments have a tendency to track the indexes they are modeled after. Five investment objective portfolios are available for the client to choose from (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive) and are modeled after Creative Financial Designs' overall diversified asset class models.

Fundamental Opportunities -- Description

The Fundamental Opportunities investment strategy is focused on using mostly active mutual funds that are available from the respective custodians to allocate within the five available investment portfolios. This strategy relies on macro-economic analysis and forecasting to determine which asset classes to over and under-weight in the portfolio. Portfolios are still usually diversified given economic data although at times may not be as diversified as other firm strategies. More active trading can also occur in this strategy depending on market and economic data. Taxable accounts are treated differently in that they are likely traded less than qualified accounts, thus attempting to reduce capital gains especially short-term gains. Five investment objective portfolios are available for the client to choose from (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive) and allocations are determined by data analysis.

Funds -- Description

The Funds Investment Strategy is focused on using mutual funds & ETF's that are available from the respective custodians to allocate within the given diversified investment portfolios. Five investment objective portfolios are available for the client to choose from (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive) and are modeled after Creative Financial Designs' other diversified asset class models.

Income Strategy -- Description

The overall concept of the Income Strategy is to provide an income portfolio solution for clients. These portfolios are focused on generating income with the goal of providing relatively stable yield given most market conditions. The firm offers three options within the Income Strategy: Lite, Core, and Core/Plus. The differences in the three options is only located in the fixed income investments and described below.

In the Lite option, the fixed income portion looks to own short-/ultrashort-duration municipals, CD's, treasuries, money markets and such types of more conservative fixed income holdings. The team looks to ladder such fixed income holdings to diversify across maturities. A small amount of cash will also be held and the potential for a small mutual fund or ETF holding for small residual amounts of investments. Fixed income holdings will vary from account to account.

In the Core option, the fixed income portion looks to own individual corporate and/or municipal bonds to build a portfolio designed to generate income. Bonds initially are rated A or better with a portfolio goal initially of AA rated. Creative's Management Team looks for higher credit quality bonds while also focusing on durations, maturities, diversification across sectors (and if necessary across multiple states for municipals), and of course yield. A small amount of cash will

also be held and the potential for a small mutual fund or ETF holding for small residual amounts of investments. The client has the option to select tax-exempt municipal bonds for their account, in order to harvest tax-exempt gains. Bonds will vary from account to account.

In the Core/Plus option, the fixed income portion looks to own individual corporate and/or municipal bonds to build a portfolio designed to generate income. Creative's Management Team looks for higher credit quality bonds, although likely less than the Core option. Bonds initially are rated BBB+ or better with a portfolio goal of initially A rated. Bonds are selected on durations, maturities, diversification across sectors (and if necessary across multiple states for municipals), and of course yield. A small amount of cash will also be held and the potential for a small mutual fund or ETF holding for small residual amounts of investments. The client has the option to select tax-exempt municipal bonds for their account, in order to harvest tax-exempt gains. Bonds will vary from account to account.

The equity portion of the portfolios (all but the Conservative portfolio, as it does not include equities) are primarily focused on large cap and giant large cap value stocks. Creative uses Bloomberg, ValueLine, Dorsey Wright, and Morningstar (and possibly other resources) to help search, identify, price, rank and determine the diversified equities to use in any given account. The firm's goal is to find price stability using several key matrices such as and not limited to: financial strength, safety ratings, yield, sectors, price points, dividend stability, etc. The number of equity holdings is limited by the account size. Equities may vary from account to account and are diversified through various sectors. Five investment objective portfolios are available for the client to choose from (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive).

Tax-Wise Strategy -- Description

The Tax-Wise Investment Strategy is available for non-qualified brokerage accounts and primarily uses ETF's and municipal mutual funds, though the firm may also choose to use other investments to build the diversified portfolios. The goal for the strategy is to reduce the amount of taxable income, dividends, and capital gains for the account. Using ETF's helps Creative use investments that historically allow clients to keep more and reduce the potential amount of capital gains passed through to accounts. Five investment objective portfolios are available for the client to choose from (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive) and are modeled after Creative Financial Designs' overall diversified asset class models.

Sector Cycle Strategy -- Description

Under the Sector Cycle Strategy, Creative attempts to analyze the market cycle, determine the current phase within that market cycle, and allocate equity investments based on sectors that tend to outperform the market in general during the applicable market phase. Creative recognizes that economists may disagree as to what market phase applies at any given time. This investment strategy is not based on any standardized model portfolio, but rather diversification among sectors. The Sector Cycle Strategy uses economic data as-well-as third party information from firms such as Fidelity, JP Morgan, etc. help determine the current cycle as well as the strength of the cycle. Allocations within ETF's and mutual funds are then used to build a portfolio based on the determination of said cycles. Mutual funds and/or ETF's will be used for the fixed income areas and ETF's for the equity sector portion of the portfolio. Five investment objective portfolios are available for the client to choose from (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive) and the fixed income portion of the portfolio is modeled after Creative Financial Designs' other models.

Alternative Investment Rider (AIR) -- Description

With respect to all of the strategies described in this section, except for certain strategies, such as: BFV CFD4, CFD4, Income Strategy, Sector Cycle, and Tax-Wise Creative makes the Alternative Investment Rider (AIR) available to its clients. Under AIR, a portion of the client's holdings, up to 25% of the portfolio, is invested to be inversely correlated, less correlated, or non-correlated to the traditional stock market. This can be done in a number of ways using ETF's and/or mutual funds. One option under AIR includes the holding of inverse index funds (either leveraged or non-leveraged) and/or certain non-correlated or less correlated, which are designed to reduce overall portfolio risk.

These AIR options are designed to reduce the overall risk and volatility of the portfolio, but there is no guarantee that this objective will be achieved.

Allocate Over Time Option -- Description

With respect to all of the strategies described in this section, except for the Sector Cycle Strategy, BFV CFD4, CFD4, and the Income Strategy, Creative makes the Allocate Over Time option available. If selected by the client, Creative will not likely invest all of the client funds into the selected model portfolio immediately. Instead, Creative will allocate the account slowly, usually over a 4-8 month timeframe, with the intention of investing funds during pullbacks in the markets. During this transition period, the account may not be invested according to the model portfolio, and may have fewer and less-diversified holdings than would be normally the case in the same portfolio.

Self-Directed Retirement Management Platform -- Description

In the Self-Directed Retirement Management platform, the assets held in clients' 401k, Creative's investment management staff manages 403b, 457, or other company retirement plan assets. The Creative Team builds diversified portfolios within the client's available investment options that can be restrictive in types of investments available.

The firm has developed asset class based model allocations based on research from other professional management models such as Morningstar (formerly Ibbotson), JP Morgan, Goldman Sachs, Blackrock, Northern Trust, etc. The firm's models generally fall into five categories based on perceived risk: Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive. Available plan investments are categorized according to the Model guidelines, and overall asset allocation is determined taking those categorizations into effect in arriving at the model portfolio allocations.

Two investment strategies exist using the Self-Directed Retirement Management platform. They are the "Active" strategy and the "Passive" strategy.

Active Strategy -- Description

The Self-Directed Retirement Management "Active" Strategy attempts to analyze clients' available investment plan options on a quarterly basis and to perhaps reallocate or rebalance quarterly (or as it sees necessary). Creative performs daily reviews to check for misallocations or changes needed for an account.

Passive Strategy -- Description

The Self-Directed Retirement Management "Passive" Strategy attempts to analyze clients' available investment plan options annually and may rebalance or reallocate quarterly, perhaps semi-annually, or longer.

Variable Annuity Management Platform -- Description

Under the Variable Annuity Management platform, Creative's Management staff will actively manage within the underlying subaccount options of the clients' variable annuity contracts/products. The service is not available with respect to all issuers' variable annuities.

Creative manages the investments to build diversified portfolios within a client's variable contract. Creative has no part in the selection of the product, riders, etc. The firm has developed asset class based model allocations based on research from other professional management models such as Morningstar (formerly Ibbotson), JP Morgan, Goldman Sachs, Blackrock, Northern Trust, etc. The firm's models generally fall into five categories based on perceived risk: Conservative,

Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive. Available investments are categorized according to the model guidelines and overall asset allocation is determined taking those categorizations into effect in arriving at the model portfolio allocations. The Medallion Investment Strategy that is currently limited to certain variable annuity products (see below) does not rely on asset allocation.

Creative takes precautions designed to prevent the benefits of an annuity contract (e.g. income benefits, withdrawal benefits, etc.) from being negatively impacted by the management of the contracts, however, it is up to the client to determine what effects, if any, will apply to a contract based on the management of the contract/product.

Creative can perform management services for a variety of variable annuity contracts, including variable annuity contracts that are commissionable. If a commissionable variable annuity contract that is otherwise available for management under this program has paid a commission to cfd Investments, Inc. and/or the investment adviser representative associated with the proposed account, Creative will not provide investment management services with respect to the variable annuity contract within two years of the inception date of the applicable contract.

Medallion Investment Strategy – Description

This strategy is designed for those investors who seek a technical approach to the management of their money. This strategy is designed for those that have a long-term focus and likely commit to invest only a portion of their portfolio in this strategy. The disciplined process has the potential to reduce volatility and may enhance overall client diversification by identifying potential growth opportunities during both bull and bear markets. Creative uses a proprietary quantitative model to assess the equity markets on a daily basis. The model attempts to determine whether conditions are favorable or unfavorable for investing.

The strategy can hold cash the majority of the time and also has the ability to short the market during rare periods of apparent weakness. The strategy can also be long the market and can use leveraged subaccounts. The use of leverage by a subaccount increases the risk to the portfolio. The more a portfolio invests in leveraged instruments, the more the leverage will magnify gains or losses on those investments.

Due to the complexity and structure of these portfolios, they may not perform over time in direct or inverse correlation to any index. Technical and dynamic investment strategies normally involve more frequent trading than the traditional "buy-and-hold" investment strategies.

This strategy is available under three options: Lite, Core and Plus.

The Medallion Lite fluctuates between in the market and out of the market, but is never investing in options that are negative the market, and does not use leveraged investment options. The Medallion Core can be in the market, out of the market, negative the market, and can use some leveraged investment options. The Medallion Plus is similar to the Medallion Core in the types of investment positions utilized, but it more heavily relies upon leveraged investments at certain times.

Under each of the strategies, market conditions are measured daily. Depending on which option is selected, when signals are neutral, the strategy typically allocates to money market type investments and subaccounts (historically 45-55% of the time). Due to the large and frequent positions in cash equivalents, the strategy may limit the upside potential of the market in a similar way that it attempts to limit the downside participation.

This program option is suitable for use with variable annuities that permit unlimited trading within the variable annuity, and have no riders affected by the strategy. Currently, this strategy is only available through the Jefferson National Monument Adviser variable annuity contract.

Biblical Faith Values Strategy – Variable Annuity -- Description

Under the Biblical Faith Values investment strategy, Creative utilizes software and asset screening programs of unaffiliated third parties in order to limit investment in the stock of companies that engage in certain industries or support certain activities or lifestyles, or otherwise contribute to or endorse such industries or activities. The firm generally endeavors to exclude investment companies that engage in or participate in or support industries or lifestyles relating to gambling, tobacco, alcohol, pornography, abortion, non-family lifestyles and other factors traditionally considered adverse to Biblical standards.

Due to a lack of investments in certain management strategies, it is likely not possible to exclude all investments that violate some of the standards that are described above. Additionally, Variable Annuities have limited sub-accounts, and those sub-accounts can change from time-to-time. These limitations can restrict application of this strategy, and this strategy cannot be effectively carried out for any Variable Annuity that does not have a sufficiently diversified selection of sub-accounts that meet the selection criteria. Due to these limitations, this strategy is only available within the Jefferson National Variable Annuity and such products as the firm selects.

The firm does not make any claim that the investments in the model will fully exclude any companies that could be excluded based on the criteria above. Instead, this Strategy will attempt to substantially reflect Biblical Values, and will otherwise attempt to follow the models established by Creative Financial Designs.

Hybrid Strategy -- Description

Available in only the Jackson National Life Elite variable annuity, unless approved by Creative's Management Team to use with other products, the Hybrid variable annuity investment strategy looks to build a diversified portfolio using both alternative type and historical asset class subaccounts. Five investment objective portfolios are available for the client to choose from (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, and Aggressive) and are modeled after Creative Financial Designs' other diversified asset class models. Depending on the product and the investment objective chosen, Creative's Management Team determines the amount of each investment type to use, however, focusing on reducing investment portfolio volatility. The goal of the strategy is to reduce the portfolio risk using alternative investments along with traditional investments, however, there is no guarantee that this objective will be achieved.

Fee-in-Lieu Brokerage -- Description

Creative provides a service to its clients whereby clients may have brokerage, variable annuity, or insurance accounts for which no separate transaction fees (i.e. trade-by-trade transaction fees) are charged for transactions that the clients may effect in the account. Creative does not provide separate investment advice for a fee under such arrangements and does not take any level of discretion with respect to the accounts. The service provided by Creative with respect to such accounts covers the transaction fees as well as the advice provided with respect to such account.

Client will not pay brokerage execution costs and commissions, but may pay such charges as:

- Certain dealer-markups and odd-lot differentials, custodial shipping and handling fees, transfer taxes, exchange fees mandated by the Securities Exchange Act of 1934, and any other charges imposed by law with regard to any transactions in the Account;
- Management and other fees on open-end, closed-end mutual fund shares, EFTs, UITs, etc.;
- Individual Retirement Accounts (IRA) fees and qualified retirement plan account fees;
- Margin interest;
- Check reordering costs and fees;
- Any contingent deferred sales charge assessed by a mutual fund company on the sale or liquidation of a mutual fund; and
- Short-term trading charges for purchases and corresponding redemptions of certain mutual fund shares (see fund prospectus for details) made within short periods of time; and
- Other fees and expenses as charged by a broker/dealer and clearing firms.

Conditions for Managing Accounts

Creative may make exceptions to the minimum account size requirements in some instances. Those exceptions may be made for a variety of client-specific reasons, which may include, but are not limited to such situations as a client having multiple managed accounts with the firm, an anticipation of the client adding additional assets at a future point in time, or such other circumstances as the firm may deem applicable.

For the managed Self-Directed and Variable Annuity investment management programs, the investment options are limited based on factors beyond the control of Creative Financial Designs, and the management of those accounts is strictly limited to the investment options available under the products being managed.

Further, the fees charged by the firm for the Account is in addition to the fees charged by the underlying investments. To the extent that a client intends to hold fund shares for an extended period of time, or purchases no load funds within the Account, it may be more economical for the client to purchase fund shares outside of the Account. Clients are advised that transferring mutual fund shares into the Account will result in an obligation to pay an annual fee based on the value of the funds held in the Account, and that such fee(s) is in addition to any sales charges or commissions paid when the funds were purchased by Client. In addition, no fee adjustments are made during any calendar quarter for appreciation or depreciation in the value of the Account. With FCCS managed accounts an additional fee may, however, be assessed if cumulative deposits during a quarter equals or exceeds \$10,000 of account value, and, a refund of fees will occur if a withdrawal equals or exceeds \$10,000 of account value. Clients are advised that they may be able to purchase similar services separately from other service providers and the cost of such services may be more or less than the program fee charged by Creative.

Financial Planning Services

Creative offers financial planning and consulting services. Under this offering, in-depth fact-finding interviews are conducted and clients may elect to receive advice and/or services on a variety of topics other than securities (e.g. budget analysis, etc.). The purpose of this approach is to address a client's entire financial life, rather than just investments.

Creative provides Comprehensive Financial Planning services. Clients desiring a less comprehensive financial plan can choose to have a "Mini" or "Modular" Plan created for them. It may consist of one or more of the following services: Estate Analysis, Medicaid Planning, Business Financial Plan, Investment Analysis, Tax Analysis, Income Funding Analysis, Insurance Analysis, Retirement Analysis, Accumulation Funding Analysis, Budget Construction/Analysis, Credit Negotiation, and Special Project Work.

Creative may provide advice regarding particular investments and securities, and these may include investments currently owned by the client, or investments that the firm or its Affiliates may have recommended to a client.

The client is under no obligation to effect securities or insurance transactions through Creative's affiliates or related persons if they choose to act on or otherwise implement any recommendations made in either a Comprehensive Financial Plan or other Modular Plan.

ITEM 5: FEES AND COMPENSATION

Advisory fees are as set forth below with respect to the various programs and services. Fees may be negotiable depending on such factors as, without limitation, special needs or requirements of the client and/or the complexity or simplicity of the work required.

Clients may elect to pay their fees directly to Creative via check and invoice, or may elect to have Creative deduct its fees directly from specified managed accounts when possible, from annuity contracts when possible, or a bank account. Clients may also elect to authorize Creative to charge its fees directly to a client's credit or debit card through PaySimple™. We also can, at the client's option, invoice the client for client to pay bills directly.

Creative does not charge performance-based fees under any advisory program, nor does it share or participate in the gains or losses of client accounts.

The firm shall be paid such compensation for its services, and in such manner, as described below. Until paid, the fees and expenses charged by the firm shall constitute a lien upon the assets of the client's managed account. In the event that additional assets are deposited into a client's managed account during a fee period, the firm may, but is not obligated to charge the client an additional fee in respect of the value of the additional assets, prorated for the number of days remaining in such fee period. In connection with any withdrawal of assets from a client's managed account or upon termination of the client's Investment Management Agreement, the firm retains the right to complete any transactions initiated or open as of the time thereof and to retain amounts in the client's managed account sufficient to effect such completion and to satisfy any amounts owing by such client to the firm under the client's Investment Management Agreement, however and whenever arising. To the extent permitted by law, cfd Investments, Inc., the affiliated broker/dealer of the firm, receives compensation from the client for services provided to the client's managed account, and the discretionary activities of the firm may affect services provided by and compensation paid to its affiliate. Such compensation includes, without limitation, ticket charges, asset-based pricing fees, custodial fees, or other miscellaneous charges, including revenue share arrangements between cfd Investments, Inc. and applicable custodians. The firm shall consider options that limit such charges,

and shall only engage in transactions that involve such charges when it is deemed by the firm that such transactions are in the best interests of the client, in accordance with the firm's fiduciary duty.

More specifically, Clients pay certain fees and charges that are in addition to firm's fees. Such fees and charges include, but are not necessarily limited to:

- Certain dealer-markups and odd-lot differentials, transfer taxes, exchange fees mandated by the Securities Exchange Act of 1934, and any other charges imposed by law with regard to any transactions in the client's account;
- Management and other fees on open-end and closed-end mutual fund shares and UITs;
- Individual Retirement Accounts (IRA) fees and qualified retirement plan account fees;
- Margin interest;
- Custodial fees such as account fees, check reordering costs and fees, and other add-on features with charges;
- Any contingent deferred sales charge assessed by a mutual fund company on the sale or liquidation of a mutual fund;
- Variable Annuity fees and expenses

Further, the annual management fee charged by the firm for the client's account is in addition to the management fees charged by open-end funds, closed-end funds, and ETF's. To the extent that a client intends to hold fund shares for an extended period of time, or purchases no load funds within the client's account, it may be more economical for the client to purchase fund shares outside of the client's account. Clients are advised that transferring mutual fund shares into the client's account will result in an obligation to pay an annual fee based on the value of the funds so held in the client's account, and that such fee(s) is in addition to any sales charges or commissions paid when the funds were purchased by the client. To the extent that the customer is charged 12b-1 fees by a mutual fund issuer based on funds maintained in the account, the firm shall not receive any compensation with respect to such fees, and if practicable, the fees charged will be returned to the client account. cfd Investments, Inc., if selected as the broker/dealer associated with the account, shall retain such 12b-1 fees, but only if the custodian cannot return those fees to the client account.

Brokerage Management – Custodial Fee at NFS/FCCS and RBC.

For managed brokerage accounts (described in section A.2.a.i of this Brochure) that are maintained at NFS/FCCS and at RBC CS as applicable, there is a custodial fee charged based on all assets in the client's account. Fees are calculated and charged monthly using the average daily account balance for all assets in the client's account. Accounts have a minimum monthly fee, which covers transaction fees, subject to a maximum number of transactions covered annually from the contract anniversary date. There will be additional ticket charges

or fees that will apply if the maximum number of transactions is exceeded in a 12-month period.

cfid Investments, Inc., an affiliate of firm, will receive a portion of the custodial fee as its compensation related to managed accounts. This compensation is in addition to the advisory fee that is collected and retained by the firm. Additional clearing fees apply to the client's account.

Managed Account Services – Fees and Compensation

Brokerage Management – Fees and Charges

Under its Brokerage Management platform, Creative charges a fee based on the value of all assets at the end of the calendar quarter and in-advance. Fees on these client accounts generally start at 0.50% of the assets under management, and may increase up to a maximum of 2.00% annually. No fees for brokerage management account services of over 2.00% shall be charged except in the instance where another investment adviser is working with Creative Financial Designs, Inc. with respect to a particular client's account, and the total fee retained by Creative Financial Designs, Inc., less the fee paid to that investment adviser, is equal to or less than 2.00%.

All fees are negotiable.

Brokerage Management services are provided for an annualized fee which is billed quarterly, in advance and is based on the value of the assets on the final day of the quarter. When an account is opened during the quarter, the fee will be prorated for the portion of the calendar quarter for which management services were provided.

Under other custodians, transaction charges and/or other related fees may apply to an account, in addition to the Creative's management fees. Clients have the option, however, to establish the account through cfd Investments, Inc., an affiliated broker/dealer of Creative, and to establish asset-based pricing, which will involve the payment of an asset-based fee that will cover transaction costs up to listed number of trades annually by the custodian, statement and mailing costs, and prospectus delivery costs. This option is available through the FCCS platform.

Although not required, it is generally the case that Creative will utilize its affiliated broker/dealer, cfd Investments, Inc., to effect all securities transactions for its clients' managed accounts. The statement of fees and other charges as described above is premised on the idea that the client selects cfd Investments, Inc. and may not apply to accounts held at other broker/dealers or custodians. In those instances, other fees will apply.

In addition to cfd Investments, Inc., Creative uses other broker/dealers including TD Ameritrade; TD Ameritrade is a broker/dealer that is not affiliated with Creative.

The advisory fees charged for the management of accounts maintained at TD Ameritrade are consistent with the advisory fees described above, however for other fees and expenses, including account opening and maintenance fees, transaction fees, and other assorted fees, clients are directed to materials produced by TD Ameritrade.

Self-Directed Retirement Management Platform

“Active” Strategy – Fees

For managed Self-Directed Retirement “Active” managed accounts, fees may be assessed on a monthly basis, in arrears, and determined according to the value of the account being managed. Creative will annually adjust the fee according to changes in the account value.

The standard initial billing rate will be determined by the account value at the time the Management Agreement is initiated and will remain in effect for the remainder of the calendar year in which the account is opened, after which, the new monthly rate may be established, and may increase or decrease based upon the account value at that time. The fee will be reevaluated annually, based on the assets as of December 31 of the previous year.

Account Size	Recommended “Active” Monthly Fee Rate
< \$24,999	\$15/month
\$25,000 - \$49,999	\$25/month
\$50,000 - \$74,999	\$50/month
\$75,000 - \$99,999	\$75/month
\$100,000 - \$124,999	\$100/month
\$125,000 - \$149,999	\$125/month
\$150,000 - \$249,999	\$150/month
\$250,000 - \$499,999	\$200/month
\$500,000+	\$250/month

Although these are the standard fees, all fees are negotiable.

If your account is on a platform that allows for direct-billing of fees, and you would like to have your fee directly charged to your account, as an alternative to the set monthly fee described above, an asset management fee of up to 1.50% of the assets under management will be charged quarterly, in accordance with the methodologies established by the applicable platform.

“Passive” Strategy – Fees

Under the “Passive” management strategy, fees will be charged at a rate of \$45, \$90 or \$135 per quarter. All fees are negotiable.

Variable Annuity Management Platform – Fees

Under the Variable Annuity Management platform, Creative charges a fee based on the value of the assets in a managed account. Fees on these accounts generally start at 0.50% of the assets under management and may increase up to a maximum of 2.00% annually. Fees are billed based on end of the calendar quarter values and in advance. In certain instances, fees may be charged to the contract, to the client directly, through another managed account if allowed, via a bank or credit card all at the client’s option. Charging fees to a contract may negatively affect certain benefits/riders of a given contract, and it is up to the client to determine what effects, if any, the payment method selected by the client will affect the contract/product.

Variable Annuity Management services are provided for an annualized fee that is billed quarterly, in advance and is based on the value of the assets on the final day of the quarter. When an account is opened during the quarter, the fee will be prorated for the portion of the calendar quarter for which management services were provided. The annual rate is fixed when a client opens an account. The rate is identified in the customer’s Investment Management Agreement.

All fees are negotiable.

Financial Planning Services – Fees and Compensation

Comprehensive Financial Plan fees are based on the client’s gross income as reported on their most recent tax return. The total fee is fixed when the client signs the Financial Planning Agreement.

Previous Year’s Gross Income	Minimum Down Payment	+	Minimum Monthly Amount	= Fee Range
under \$50,000	\$280		\$35	\$700-2,000
\$50,000 but under \$75,000	\$380		\$35	\$800-3,000
\$75,000 but under \$100,000	\$480		\$35	\$900-4,000
\$100,000 but under \$150,000	\$580		\$35	\$1,000-5,000
\$150,000 but under \$250,000	\$680		\$35	\$1,100-10,000
\$250,000 and above	\$780		\$35	\$1,200-20,000

The down payment is due upon submission of the client’s data. The monthly payment is due each month for the following 12 months. If there is a balance due, (the contract price less the down payment and the monthly payments is less than the total fee), then the balance is due 30 days after the written report is completed

and made available to the client. Clients may elect to pay the total plan fees all at once instead of monthly.

Clients desiring a "Mini" or "Modular" Plan, including but not limited to the following services, may pay fees ranging as noted below:

	Service	Fee Range
1.	Estate Analysis	\$600-20,000
2.	Medicaid Planning	\$200-10,000
3.	Business Financial Plan	\$600-20,000
4.	Investment Analysis	\$300-3,000
5.	Tax Analysis*	\$300-3,000
6.	Income Funding Analysis	\$150-3,000
7.	Insurance Analysis	\$150-3,000
8.	Educational Funding Analysis	\$150-3,000
9.	Retirement Analysis	\$300-3,000
10.	Accumulation Funding Analysis	\$150-3,000
11.	Budget Construction/Analysis	\$300-3,000
12.	Credit Negotiation	\$50/hr. + expenses
13.	Special Project Work	up to \$350/hr.

As a rule, with Modular Planning, the entire fee is due upon delivery of the analysis or service and is generally not refundable.

The client is under no obligation to effect securities or insurance transactions through the firm 's affiliates or related persons if they choose to act on or otherwise implement any recommendations made in either a Comprehensive Financial Plan or other Modular Plan.

ERISA Accounts

Creative is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income Security Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Creative may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset Creative's advisory fees.

Other Fee-Paying Services

Clients may also be charged for resources received from Creative.

Hourly Fee: Client and Creative may agree to elect for an hourly fee arrangement for stated services for the client. These likely specialty services can be billed up to \$350 per hour.

Retainer Fee

Client and Creative may agree to elect for a retainer fee payment option up to \$2,500 per month, paid monthly, quarterly, or annually, based on the agreed upon services provided for the client. Creative will provide the services for such fee until the client or the firm terminates the relationship, which may, depending upon the services requested during a period, result in an hourly equivalent fee that is higher or lower than Client would have paid during the period on a standard hourly basis.

* With respect to the Tax Analysis identified above, we provide guidance and expectations about the tax consequences of certain investment decisions, but Creative Financial Designs does not provide legal or tax advice, and will work with the attorney or accountant of the client about any tax-related recommendations. Additional costs charged by the client's attorney and/or accountant (or by any other additional outside services provider), is the responsibility of the client.

Termination Provisions

Termination of advisory services can be accomplished by written notice from one party to another. Under the Managed Brokerage account and Variable Annuity platforms, Creative will return to client any unearned pre-paid advisory fees upon receipt of termination notice.

With respect to financial planning services, the Financial Planning Agreement may be terminated by either party upon written notice. If, before the total fee has been paid, the client is not satisfied and the plan cannot be modified, then one-half of the total fee that has been collected will be refunded. If, after payment in full, the client is not satisfied and the plan cannot be modified, then 50% of the total fee will be refunded. Any claim for refund of a financial plan fee must be made within sixty days of delivery of the completed plan to the client.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

The firm and your representative do not accept performance-based fees for investment management services.

The firm does not provide side-by-side management of mutual funds and other assets.

ITEM 7: TYPES OF CLIENTS

Creative provides advisory services to individuals, including high net worth individuals and business entities, such as charitable organizations, as well as to employer retirement and pension plans. For account minimums, see the Overview of Advisory Business and look to the particular service.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

For Managed Accounts, Creative, with the use of independent software, proprietary programs, internet programs, research, and tools that seek to match the client investment goals, objectives and risk tolerance to the client selected management portfolio, and then within each portfolio, the appropriate strategy, as selected by the client. Categorizations of assets are made using the Morningstar software, when possible. Appropriate adjustments to the overall model portfolios are determined by Creative's Investment Committee, and are based upon the committee members assessments and views of then-current or future forecasted market and industry circumstances, in addition to other variables such as economic, demographic and geo-political events both in the U.S. and globally.

With respect to financial planning activities, Creative utilizes several professional planning software programs, depending upon the client needs and desired scope of services.

With all investments and investment strategies there is a risk of loss of investment principal, and no guarantees are or can be made that any particular investment, investment plan or strategy will fulfill its objective or prove to be profitable.

Education, Business Standards of Persons Giving or Determining Advice

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. Creative will work with each Client to determine their tolerance for risk as part of the portfolio construction process. 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 be willing to bear. Clients are reminded to discuss these risks with their investment advisor representative.

Investment Advisers cannot provide management for clients directly except as approved by Creative, and must follow the guidelines established by Creative Financial Designs.

Creative utilizes an Investment Committee in determining the general strategies employed in the delivery of investment advice provided to clients. Individualized advice is determined by members of the Financial Planning Department and/or

appropriately qualified and Investment Advisers, within the parameters approved by the Investment Committee. The professionals in the Investment Management Department determine specific strategic determinations for actively managed accounts.

Biographies of the Investment Committee members are set forth below:

Brent A. Owens, born in 1969, graduated from Indiana Wesleyan University with a B.S. in Business Administration in 1992. He is a General Securities Principal and a Financial Operations Principal. He has passed the following FINRA/state-regulatory qualifying examinations: Series 7, Series 24, Series 27, Series 63 and Series 65. He is an active member of the Financial Services Institute and the National Association of Insurance and Financial Advisers. Mr. Owens has been President of the firm and cfd Investments, Inc. (a registered broker/dealer) since 1997. From 1992 to 1997, Owens served both the firm and cfd Investments, Inc. in various capacities, including plan writing and investment management of the firm's managed accounts.

Kregg J. Rooze, born in 1974, graduated from Purdue University with a B.S. in Financial Counseling and Planning and Consumer Affairs in 1998. He is a General Securities Principal and Vice President of the firm. He has passed the following FINRA/state-regulatory qualifying examinations: Series 7, Series 24, and Series 63. He began working for firm in 1997. His experience includes plan writing, but, since 1999, Rooze served as the Managed Account Director of the firm.

Matthew O. Bahrenburg, born in 1970, graduated from Tabor College with a B.A. in Philosophy in 1992, and received his J.D. from the University of North Dakota Law School in 1995. Since 2012, He has served as the Chief Compliance Officer of the firm. He is a General Securities Principal, and also serves as the Chief Compliance Officer and General Counsel of cfd Investments, Inc. He has worked in the Compliance Departments of cfd Investments, Inc. and the firm since 2007. He has passed the following FINRA/state-regulatory qualifying examinations: Series 7, Series 24, and Series 66. Bahrenburg was an enforcement attorney with the North Dakota Securities Department from April 1996 until February 2007.

Daniel K. Hale, born in 1972, graduated from the University of North Carolina - Pembroke in 1995 with a B.S. in Business Administration. He also has an Associates Degree in Accounting from Garden City Community College. He is a General Securities Principal and an Options Principal, as well as Vice President of cfd Investments, Inc. He has passed the following FINRA/state-regulatory qualifying examinations: Series 4, Series 7, Series 24, Series 27, Series 62, and Series 63. He has been working for cfd Investments, Inc. since 1995.

Mick Owens, born in 1946, graduated from Indiana State University in 1968 with a B.S. in Mathematics. Owens is the founder of the firm and of cfd Investments, Inc. Owens is also the founder of several companies that do not have material

interrelationships with the firm; cfd Insurance Planners, cfd Accounting Services, and cfd Realty. Owens has obtained the CLU, ChFC, and CFP designations and is a general securities principal. He has passed the following FINRA/state-regulatory qualifying examinations: Series 7, Series 24, Series 63 and Series 65.

Chris Rockey, born in 1979, graduated from Butler University in 2001 with a B.S in Physician Assistant Studies. Chris has worked in the financial services industry since 2008 after working as an emergency department Physician Assistant for more than 10 years. He works with individuals and small businesses to help them formulate their financial goals and develop strategies to implement them. Rockey has obtained the ChFC designation and has passed the following FINRA/state-regulatory qualifying examinations: Series 7 and Series 66.

Other Business Activities

Solicitor Activities

Acting as Solicitor:

The firm may in some instances act as a solicitor for third party asset managers and receive a fee for its solicitation activities. The fee received may include any of the following: a portion of the asset management fee charged to the client, a platform fee paid directly by third party asset manager, which may or may not be based on the assets under management maintained by the asset manager.

Engaging Solicitors:

To the extent permitted under applicable state law(s), the firm may pay a fee under its referral program. The amounts paid and the persons eligible under the referral program are provided for by written agreement. The amount is based on a percentage of the fees it collects for investment advisory or financial planning services.

Other Activities of Staff Members and Investment Adviser Representatives

Most of the firm's personnel and investment adviser representatives are registered representatives of cfd Investments, Inc., a securities broker/dealer and affiliated entity of Creative. cfd Investments, Inc. acts as broker for securities transactions and, in those instances, receives a portion of the custodial fee and/or transaction-based compensation. Where an advisory client of Creative elects to effect securities transactions through cfd Investments, Inc., his or her investment adviser representative, acting in the capacity of registered representative, will be compensated thereon.

The client is not obligated to affect any transactions through cfd Investments, Inc. but may choose to utilize the broker/dealer firm of their choice. Not all investment strategies are available when using other broker/dealer firms and must be approved for use before management can occur.

A client's investment adviser representative or cfd Investments, Inc. may occasionally purchase securities which are also recommended to other of Creative's clients. This situation almost universally entails publicly traded stocks or mutual funds, where there is little risk that Creative might disadvantage a client or his or her financial adviser trading in advance of clients. However, Creative's investment adviser representatives are required to affect any client transactions prior to affecting their own.

In addition to acting as investment adviser representatives of Creative Financial Designs and registered representatives of its affiliate, cfd Investments, Inc., investment adviser representatives may also have various other outside business activities, related to the financial services industry or entirely unrelated. All outside business activities of investment adviser representatives must be disclosed to, and approved by, Creatives' Compliance Department. Creative will make disclosure of potential conflicts of interest to its clients relating to individual circumstances in such situations.

ITEM 9: DISCIPLINARY INFORMATION

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. Our firm and our management personnel have no reportable disciplinary events to disclose.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES OR AFFILIATIONS

Creative has some common shareholders, officers and directors with cfd Investments, Inc., cfd Insurance Planners, Inc. and other companies related only by common ownership. No CFD company has a controlling ownership interest in any other CFD company. cfd Investments, Inc., is an SEC-registered Broker/Dealer and member of FINRA and is also an insurance agency. cfd Insurance Planners is a licensed life and health insurance agency. As disclosed elsewhere, there is also cfd Realty [a real estate broker]. The object is to make the products and services of those companies available to clients, if desired, in order to provide superior services and products toward achievement of clients' overall financial goals. However, unless otherwise noted herein, clients are not obligated to use either cfd Investments or any other affiliated entity in the course of implementing advice given by Creative. For some management platforms, clients are required to use the services of cfd Investments, Inc. for brokerage services. While the firm believes that the fees, commissions and charges of cfd Investments, Inc. are competitive with the industry norms and the negotiation of commission rates is possible, clients may be able to obtain substantially similar services from other industry broker/dealers at lesser cost.

ITEM 11: CODE OF ETHICS -- PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

Creative, its employees and financial advisers are subject to the firm's Code of Ethics. The Code generally provides that in all of Creative's business the best interest of the client is primary. Conflicts of interest are to be avoided and, where they cannot be avoided, acted upon in the client's best interests. The Code further requires employees and financial advisers to, among other things, adhere to all applicable regulatory requirements and to protect the confidential information of clients. This Code of Ethics also controls the investment adviser representatives when it relates to their personal investment transactions, all of which are monitored by the firm to ensure that personal trading does not interfere with the obligations and responsibilities of the investment adviser representative to the client. Clients may obtain a copy of the firm's Code of Ethics upon request.

Specifically, financial advisers are precluded from conducting trading in their personal accounts or in the accounts of family members within 24 hours of trading the same securities, except to the extent that it relates to block trades which are fully executed. See Section M of the Code of Ethics, for more information on this restriction.

Although not required unless certain portfolios or strategies are utilized, it is generally the case that the firm will utilize its related broker/dealer, cfd Investments, Inc., to affect all securities transactions for its managed accounts. (See also "OTHER FINANCIAL INDUSTRY ACTIVITIES OR AFFILIATIONS")

ITEM 12: BROKERAGE PRACTICES

Choice of Broker/Dealers

Although not required, it is generally the case that Creative will utilize its affiliated broker/dealer, cfd Investments, Inc., to effect all securities transactions for its managed accounts. cfd Investments, Inc. utilizes Fidelity Custody and Clearing Services ("FCCS") and RBC Correspondent Services ("RBC CS") as its clearing firms, and those firms provide such services as transaction execution, clearance, settlement and custody. Creative believes that the fees, commission and other charges available through cfd Investments, Inc. are competitive relative to the services provided. Clients may negotiate commissions and other charges.

For brokerage accounts established through FCCS, asset-based pricing will apply to the account, which will be a fixed charge that will be applied to cover the custodial and transaction-based fees associated with the managed account. This is not a "Wrap Fee," as the advisory fee associated with the management of the account is separately identified and negotiated. Additionally, the financial adviser does not share in any portion of the asset-based pricing fee. The fee principally offsets those costs incurred by Creative and/or cfd Investments, Inc. based on the

fees charged by FCCS for the custody and trading services that they provide. cfd Investments, Inc. will also receive some additional compensation as a result of the charges. cfd Investments, Inc. will not receive any additional compensation based on a decision of the manager to conduct more frequent transactions in a customer's account.

An additional option for the choice of broker/dealer is TD Ameritrade. For the costs and expenses related to TD Ameritrade, please check with the information made available by those broker/dealers, as their fees and charges can change from time to time. Transaction fee charges occur at TD per trade unless the investments fall under any of TD's no fee transactions.

Execution of Transactions

When effecting securities transactions for managed assets on the RBC CS and FCCS transaction platforms, the firm's personnel will generally effect transactions for all clients on one platform (i.e. either RBC CS or FCCS) before effecting the transactions for clients on the other clearing platform. Typically, Creative will conduct all of the transactions on the FCCS platform before making the corresponding transactions on the RBC CS platform. This practice will result in some clients obtaining execution of their portfolio transactions earlier than clients on the other clearing platform and in periods of market volatility, could result in differing execution prices for some clients for transactions involving the same securities.

Soft Dollars/Referrals/Directed Brokerage

Creative does not accept products or services that do not qualify for Safe Harbor outlined in Section 28(e) of the Securities Exchange Act of 1934, such as those services that do not aid in investment decision-making or trade execution.

Creative does not direct brokerage to any broker/dealer in return for any form of compensation or referrals. Creative utilizes the brokerage services of cfd Investments, Inc. and generally recommends, and in some cases requires that advisory clients utilize the services of the affiliated broker/dealer. However, financial planning clients are advised that they are free to use the broker/dealer of their choice to implement financial planning recommendations. Clients should be aware that a conflict of interest is present when utilizing cfd Investments, Inc. for plan implementation transactions since their financial adviser may be compensated for such securities transactions by the broker/dealer. That compensation in their capacity as registered representatives is in addition to any compensation they may receive from Creative in their capacity as investment adviser representatives.

ITEM 13: REVIEW OF ACCOUNTS FINANCIAL PLANS

Review of Accounts

Managed accounts are reviewed continually by the Managed Accounts Department. Various internal limits on gains, losses, allocation, and diversification are constantly monitored via independent software and alerts and signals as well as personal observations. In order to ensure that all portfolio transactions, holdings and values are correct and current, Creative urges its clients to carefully review all statements received directly from the independent financial institutions and qualified custodians. Furthermore, the Managed Accounts Director or his designee reviews all trades.

Review of Financial Plans

The firm's home office staff review a sampling of financial plans including written financial planning advice. Compliance and Supervision personnel also conduct periodic reviews of financial advisor activities.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

There is no formal client referral arrangement between cfd Investments, Inc. and Creative, but there are clients of Creative that are also clients of cfd Investments, Inc. and it can be understood that clients are being referred between cfd Investments, Inc. and Creative. Additionally, most investment adviser representatives of Creative are also registered representatives of cfd Investments, Inc. These facts may be a consideration in a recommendation by Creative to utilize cfd Investments, Inc. as its broker/dealer.

ITEM 15: CUSTODY

All client assets are held at qualified custodians who provide account statements directly to clients per their stated way of receiving (through online access, email, or mail).

While Creative does not take physical custody of client funds or securities, SEC rules under the Investment Advisers Act of 1940 deem the firm to have custody of client assets because of certain business methodologies employed by Creative. The firm is deemed to have "constructive custody" under regulatory guidelines because of Creative's authority from certain clients for our firm to directly debit client advisory fees from their custodian accounts consistent with industry practices and regulatory guidelines. Furthermore, most clients under the Self-Directed Retirement management platform gives Creative access to their employer plan account to allow the firm to effect investment management transactions with regard to those assets. Under SEC rules, this level of access to client assets is considered the equivalent of Creative having "custody" of the client

assets.

Because Creative is deemed to have custody of client assets due to the circumstances described above, the firm has engaged an independent auditor to perform an unannounced audit of Creative's activities relating to client assets on at least an annual basis. The purpose of the audit is to ensure that the firm and its personnel are dealing appropriately with client assets and to verify those client assets with the respective custodians where the client assets are held, as well as directly with clients themselves. The results of these audits are available upon request.

ITEM 16: INVESTMENT DISCRETION

Creative exercises discretion with respect to the Brokerage Management, Self-Directed Retirement, and Variable Annuity Management programs. Discretion gives Creative the authority to determine the securities to be bought and sold without obtaining specific client consent, unless a client of Creative specifically requests that certain securities not be purchased in their accounts. For managed accounts utilizing brokerage accounts (e.g. equity securities), it is not required that the clients utilize cfd Investments, Inc. as the broker of record, or a third party broker/dealer approved by Creative.

Though the firm generally recommends that planning clients utilize cfd Investments, Inc. for securities transactions, the planning clients' choice of broker/dealers to use for the implementation of securities transactions is the client's decision.

ITEM 17: VOTING CLIENT SECURITIES

Creative does not vote proxies for its clients with regard to their securities holdings. All client securities are held at their respective custodians in the name of the client and therefore client custodians' direct proxies to the clients themselves for voting.

ITEM 18: FINANCIAL INFORMATION

Creative does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance. In addition, Creative is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

cfd Leasing, Inc. (hereinafter, "Leasing"), a company that provides staffing services to Creative has received a loan through the U.S. Small Business Administration ("SBA") Paycheck Protection Program ("PPP"), which allowed eligible individuals and small businesses to obtain loans during the COVID-19 crisis. A PPP loan is eligible for forgiveness, provided the terms of the loan forgiveness are satisfied.

Leasing certified to the SBA that the receipt of the loan was necessary to support its ongoing operations and staffing, given COVID-19 pandemic concerns.

The SBA has subsequently advised all PPP borrowers that they were required to make this certification in good faith, taking into account their current business activity and their ability to access other sources of liquidity sufficient to support their ongoing operations in a manner that is not significantly detrimental to their business. Creative will receive a benefit as a result of the loan and the anticipated subsequent forgiveness, and this benefit will assist Creative with the payment of salaries for our employees, including those who are primarily responsible for performing advisory functions for our clients. We believe that the PPP Loan was necessary to support Leasing's existing operations without layoffs or reductions of employee compensation. However, we do not believe we would have been unable to meet any contractual commitment absent our receipt of the benefits received by Creative absent the PPP loan provided to Leasing.