

Item 1 - Cover Page

Peace of Mind Financial Planning, Inc.

7222 Commerce Center Drive

Suite 175

Colorado Springs, CO 80919

(719) 836-8181

www.peaceofmindfinancialplanning.com

December 9, 2021

This firm brochure ("Brochure") provides information about the qualifications and business practices of Peace of Mind Financial Planning, Inc. If you have any questions about the contents of this Brochure, please contact us at (719) 836-8181. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Peace of Mind Financial Planning, Inc. is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Peace of Mind Financial Planning, Inc. is 289067.

Please note that the use of the term "registered investment advisor" and description of our firm and/or our associated persons as "registered" does not imply a certain level of skill or training. Clients are encouraged to review this Brochure and any brochure supplements ("Brochure Supplements") for more information on the qualifications of our firm and our associated persons.

Item 2 - Material Changes

Since our last annual amendment filed on March 22, 2021, we have made the following material changes to this Brochure:

- On August 2, 2021, Linda Leitz PhD, CFP®, EA, CDFA, became the sole owner of the firm. Effective as of the same date, Terri J. Schlabs is no longer an owner of the firm.
- We became registered as investment advisor registered with the SEC as of September 30, 2021.
- Danielle R. Parris-Exline (“Dani”) joined the firm in April 2020. Please see Dani’s ADV Part 2B Brochure Supplement for more information about her qualifications.
- Item 1 was updated to reflect that effective as of December 1, 2021, our office address has changed to 7222 Commerce Center Drive, Suite 175, Colorado Springs, Colorado 80919.
- Item 5 was updated regarding our services and fees.
- Item 10 was updated regarding our other financial industry activities and affiliations.

We have made other changes throughout this Brochure for purposes of clarifying the nature of our services and fees and to enhance the overall readability and transparency of the disclosures contained herein. These changes are not material.

We will ensure that all current clients receive a Summary of Material Changes to this and subsequent Brochures within 120 days of the close of our fiscal year. A Summary of Material Changes is also included with our Brochure on the SEC’s website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Peace of Mind Financial Planning, Inc. 289067. We will provide ongoing disclosure of any material changes to this Brochure as necessary and will provide you with a new brochure whenever such changes occur, promptly and without charge.

You may request a copy of our Brochure at any time by contacting us at (719) 836-8181 and/or by e-mail to linda@peaceofmindfin.com and a copy will be provided to you free of charge.

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Item 4 - Advisory Business

About our Firm. Peace of Mind Financial Planning, Inc. (“POMFP,” “firm,” “we,” “our,” and “us”) became registered as investment advisor with the United States Securities and Exchange Commission as of September 30, 2021. From 2017 through 2021, we were registered as an investment advisor in the State of Colorado. Linda Y. Leitz, CFP®, EA, CDFA (“Linda”) is the owner of the firm. Linda and Danielle R. Parris-Exline (“Dani”) serve as the firm’s investment advisor representatives and provide financial advice to clients (“client,” “you,” and “your”). Our sole offices are located in Colorado Springs, Colorado.

POMFP and its associated persons do not sell insurance or investment products such as annuities, insurance, stocks, bonds, mutual funds, or any other commissioned products, and we are not affiliated with any entities that sell such products. No commissions, referral fees, or finder’s fees in any form are accepted. We are a “fee only” financial planning firm remunerated solely by the advisory fees paid to us by our clients. We believe this method of compensation best aligns with our fiduciary duty to you.

We provide custom-tailored financial planning services and advice to individuals, families, and non-profit organizations. We consult on investments, long term financial goals such as retirement and education funding, tax planning, estate planning, cash flow and budgeting, insurance coverage and risk management, and record keeping. We prepare personal tax returns for the majority of our clients. Our typical clients have a net worth (assets minus debts) of between \$500,000 and \$5,000,000 and household incomes of \$100,000 to \$250,000. Some of our clients are in retirement or within 15 years of retirement. A number of our clients have experienced a divorce or the death of a spouse. Consulting on the financial issues surrounding divorce is an additional focus area for our firm.

Prior to engaging our services, we offer an exploratory consultation to discuss the potential benefits and costs of financial planning to the client and to address any questions the client may have regarding our firm, our professional team, and our services or fees. Our services commence only upon the client’s execution of a written advisory agreement with POMFP.

A detailed description of our services is found below.

Our Services. Most clients who engage POMFP receive a robust suite of ongoing financial planning and non-discretionary asset management services. When you engage us for these services we will consult with you at the inception of our relationship to learn about your financial goals, tolerance for risk, time horizon for investments, tax situation, future goals, income, expense, and cash flow expectations, and other factors, and document the same in our records. Based on our analysis of this information, and as further informed by our subsequent periodic consultations with you, we will provide you with ongoing detailed financial planning and investment management advice that is uniquely tailored to your financial circumstances, investment objectives, and needs. We will review the status of your investments and update our financial planning recommendations to you on a periodic basis or at your specific request throughout the term of our relationship.

You always maintain the sole and exclusive discretion to accept or reject any of our financial planning and investment recommendations. You will be required to grant us trading authority over your brokerage account held at an independent qualified custodian and we will only implement the investments we recommend to you within these accounts after we obtain your approval. We will monitor the status of your designated account(s) on an ongoing basis and we will recommend changes to your holdings as appropriate and as we believe to be in your best interests. Where our recommendations relate to assets

held away from your designated account(s) (e.g., employer sponsored retirement accounts, education savings accounts, insurance products), you will be responsible for investment implementation and monitoring.

The financial advice and recommendations provided as part of our services may include, without limitation, recommendations that you begin or revise certain investment programs; create or revise wills or trusts; obtain or revise insurance coverage; commence or alter retirement savings; establish education savings or charitable giving programs; and/or purchase or sell certain specific securities. We may also recommend that you engage certain third party professionals (e.g., attorneys, accountants, insurance brokers, mortgage professionals) to implement some or all of our advice. You are never obligated to engage any third party we recommend and do so at your sole discretion and risk. We do not receive referral fees or any other form of remuneration when referring you to any third party professionals. We will only refer you to a third party for services when we believe the same to be in your best interests.

Our financial recommendations under this service may take the form of written reports, summaries, checklists, financial plans, budgets, and/or other documents. We may also provide advice via in person consultations, by telephone, tele-video conferencing, e-mail, or other means.

Types of Investments. The types of investments we may recommend to clients are described below in Item 8 of this brochure.

Wrap Fee Programs. We do not participate in, sponsor, or recommend any wrap fee programs to clients.

Our Assets Under Management. As of July 31, 2021, we managed \$0 of client assets on a discretionary basis and \$116,161,000 of client assets on a non-discretionary basis.

Item 5 - Fees and Compensation

Our Advisory Fees. Fees for our services are charged on a fixed fee basis and are determined for each client based upon our understanding of the complexity of the client's overall financial situation and needs and our expectation of the time and resources necessary to provide the requested services. In determining the specific fee to be charged, we may consider your annual income, investable assets, total net worth, the nature and placement of your assets, whether we will perform any tax preparation services as part of the engagement, any relationships you maintain with our firm, our associated persons or current clients, and any other factors we deem relevant. We do not negotiate fees with clients, but a fee may be modified based on information a client brings to our attention which was not considered in the originally quoted fee. Fees for annual services are billed quarterly in advance. On rare occasions, we may offer to charge the client hourly fees for consultations related to financial concerns arising in the context of a divorce. The decision to provide hourly services is solely at the firm's discretion. In those instances, the hourly fee we charge you will not exceed \$450 per hour. We may also agree to provide tax preparation services to clients on a stand-alone basis for fixed fees of up to \$250.

Most clients who engage our ongoing services pay annual fees ranging from \$5,000 to \$35,000. For family members of existing clients, we may occasionally agree to charge reduced annual fees for our services in recognition of reduced complexity of assets and income. These reduced fees typically range from \$1,500 to \$4,500 annually. All advisory fees are agreed with the client in writing prior to the commencement of

our services and are paid to us by cash, check, credit card, or through direct deduction from the client's account held at the independent qualified custodian.

Our financial planning professionals are paid by salary or by the hour. Occasional bonuses are paid based on job performance.

Additional Fees and Costs. Separate and in addition to our advisory fees, clients may incur certain other fees, charges, and/or taxes in connection with our services. Such additional charges and fees may be imposed by custodians, brokers, and other third parties independently engaged by the client, and may include brokerage commissions, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other similar charges. Mutual funds and exchange traded funds ("ETFs") will also separately charge internal management fees to the client. The nature and amount of these fees are disclosed in each fund's prospectus. Such charges, fees, commissions, and taxes are exclusive of, and in addition to, our advisory fees. We do not receive any portion of these additional fees, charges, taxes, and costs.

Direct Fee Deduction. As described above, clients may elect to authorize us to directly deduct our advisory fees from their designated account(s) held at the qualified custodian. Where applicable, your authorization for direct fee deduction will be set forth in our written advisory agreement and/or the account opening documents of your custodian. In accordance with our advisory agreement, we will periodically submit a written request for payment of our advisory fees to your custodian. We will first look to cash balances in your account or to liquidate money market shares to pay our fees. In the event that cash balances or money market shares are not available, we will seek your approval to liquidate other investments to pay the advisory fees then due. We will only liquidate investments held in your account for purposes of paying our fees in accordance with our fiduciary duty to you.

The custodian of your account will send an account statement to you at least quarterly identifying the amount of funds and each security in your account at the end of the period and setting forth all transactions in the account during the period, including the amount of any advisory fees paid directly to us. Where you have elected to have us directly deduct our fees from your account at the custodian, we will send you a separate informational notice indicating payment has been made from your account immediately following each fee deduction transaction. Please see Item 15 (Custody) for more information. We encourage you to review the custodian's account statements carefully and promptly upon receipt. If you believe the advisory fees charged to your account have been miscalculated or if there is any other issue with your account, you should contact us immediately at the phone number listed on the cover page of this Brochure.

Our Refund and Termination Policies. POMFP or the client may terminate an agreement for advisory services at any time upon delivery of written notice of termination to the non-terminating party. In circumstances where POMFP has failed to provide the client with a copy of this brochure at least 48 hours in advance of entering into an advisory agreement, the client may terminate our services without cost or penalty within 5 business days of the parties' execution of the agreement. For all other terminations, the client will be required to pay our firm a pro-rated advisory fee based upon the firm's binding good faith estimate of the value of services provided through the date of termination. Any pre-paid but unearned fees will be promptly refunded to the client.

Compensation For Sale of Securities or Insurance Products. As described above, POMFP is a fee-only financial planning firm remunerated solely by the advisory fees paid by its clients. The firm and its associated persons do not receive or accept any compensation for the sale of any securities, investment products, or insurance products.

Item 6 - Performance-Based Fees

The firm does not charge performance-based fees or engage in side-by-side management of accounts.

Item 7 - Types of Clients

POMFP typically provides services to individuals, high net worth individuals, and non-profit organizations. The demographics of our typical clients are described in greater detail above in Item 4 of this brochure. The firm values having clients from all walks of life. Accordingly, we customize our fees based on each client's unique financial circumstances and financial planning needs as described in Item 5. Except as described in Item 5, we typically require a minimum annual fee of \$5,000. We may reduce or waive this minimum fee requirement entirely based on legacy client relationships or other client specific factors as we may determine in our sole discretion.

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

Our Methods of Analysis. The primary investments recommended to clients consist of publicly traded mutual funds, ETFs, certificates of deposit, money market funds, cash and cash equivalents. Where appropriate and suitable for the client, we may recommend other types of investments. We may also advise on any legacy investments held by the client at the inception of our relationship and/or other investments specifically requested by the client. POMFP's Investment Committee is composed of all members of the firm and uses information that is available through public means, financial industry periodicals, or purchased to analyze investment recommendations. Recommendations are based on functional asset allocation which includes clients' investments both in and out of retirement accounts, savings, home, other real estate, and other assets. Personal information about the client and potential risk factors for the client are taken into account for investment recommendations when that information is available.

In addition to the risk of losing money invested, the risks of inflation, running out of money, and a change in lifestyle due to inadequate funds are discussed with clients. Our general philosophy is that an asset allocation that's appropriate for a client does not require frequent trading and that emotional responses to financial markets can often harm the performance of client investments. We typically advise against these strategies.

Our Investment Strategies. We generally recommend the following investment strategies:

Long Term Purchases: We primarily recommend a long term, passive, "buy and hold" approach to investing client assets. In this type of investment strategy, we suggest the purchase of securities with the idea of holding them in a portfolio for a year or longer. Typically, we employ this strategy when (1) we believe the securities to be currently undervalued, and/or (2) we want the client's portfolio to have exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our subjective beliefs about the value of a security turn out to be incorrect, the subject security may decline sharply in value before we make the recommendation to the client to sell.

Mutual Fund and ETF Selection and Analysis: We evaluate and recommend mutual funds and/or ETFs for your account based on several factors which may include, without limitation, (1) the experience and track record of the underlying portfolio manager(s), (2) the performance of the mutual fund or ETF over time and through various market conditions; and (3) expected market conditions that might impact the underlying holdings of the mutual fund or ETF. We also monitor the mutual fund or ETF in an attempt to determine if the fund is continuing to follow its stated investment strategy. Clients are encouraged to carefully review the prospectus of each mutual and/or ETF in which they invest for a summary or related risks.

Summary of Investment Risks. We use our best judgment and good faith efforts in rendering investment advice to our clients, acting in a fiduciary capacity. We cannot warrant or guarantee any particular level of investment performance or that any investment or account will be profitable over time. Not every investment recommendation we make will be profitable. Investing in securities involves risk of loss that clients should be prepared to bear. You assume all market risk involved in the investment of your assets. Investments are subject to various market, currency, economic, political, and business risks.

While all investing involves risks, including the risk of loss, we generally recommend a broad and diversified allocation of your assets intended to reduce the specific risks associated with a concentrated or undiversified portfolio. Securities investments are not guaranteed, and you may lose money on your investments. Our investment recommendations are subject to market risk—the possibility that securities prices will decline over short or extended periods of time. As a result, the value of your account(s) will fluctuate with the market, and you could lose money over short or long periods of time. You should recognize whenever you determine to invest in the securities markets your entire investment is at risk. Clients should not invest money if they are unable to bear the risk of total loss of their investments. You are solely responsible for the results of any self-directed transactions.

It is your continuing responsibility to give us complete and accurate information and to promptly notify us of any changes in your financial circumstances during our advisory relationship. We encourage you to contact us regularly to discuss any such changes.

Item 9 - Disciplinary Information

POMFP is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of our firm or the integrity of our management. No principal or associated person of our firm has any information to disclose under this Item.

Item 10 - Other Financial Industry Activities and Affiliations

Our firm and our associated persons are not registered, nor do they have an application pending to register, as a broker-dealer, futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of any of the foregoing.

We have no arrangements or other financial industry affiliations to disclose which would be considered material to our business or to our clients or which would present any material conflicts of interests with clients. We do not receive any additional compensation or benefits, either directly or indirectly, in connection with referrals of our clients to any attorneys, accountants, insurance brokers, mortgage professionals, or any other third parties. We will only recommend and refer such third-parties to you when we believe such recommendations to be in your best interests.

Linda and Dani are both National Association of Personal Financial Advisor (“NAPFA”) members and Linda is a former chair of NAPFA. She was formerly on the CFP Board’s Commission on Standards and is currently serving on the Standards Resource Commission. Linda and Dani are also members of the Financial Planning Association (“FPA”) and Linda has served on the local FPA chapter board. Where POMFP is not able to serve a client due to time constraints or special needs, Linda may refer the client to other NAPFA members, as well as the two organizations detailed below.

Linda and Dani are also a members of the Alliance of Comprehensive Planners (“ACP”). This organization is owned and operated by fee-only financial planners and provides a methodology for financial planning services as well as a community of like-minded financial planners who share ideas and planning tools. Our firm uses some of the methods developed by ACP and has contributed to the organization through committee involvement, presenting at conferences, and training of other advisors.

Linda is a member of XY Planning Network (“XYPN”). XYPN is an organization of fee-only financial advisors who specialize in helping people who are in the process of establishing and building their financial lives.

Dani is a member of the Association of African American Financial Advisors (“AAAA”). AAAA is a non-profit membership organization for African American financial advisors and affiliated professionals.

We provide income tax return preparation for many of our clients. Clients are never required to engage us for these services and may choose any tax preparer of their desire.

Item 11 - Code of Ethics

Our Code of Ethics. POMFP maintains a written Code of Ethics (“Code”) that governs the manner in which we conduct business with our advisory clients. Among other things, our Code calls for our firm and our associated persons to follow the below guidelines. A copy of our Code is available to any client or prospective client free of charge, by contacting us at the telephone reflected on the cover page of this Brochure.

- As fiduciaries, we must always strive to act in the client’s best interest.
- Any conflicts of interest to clients relative to our ability to provide objective advice will be promptly disclosed to the client and mitigated. There will be no trading practices in which a member of the firm and a client of the firm have a transaction in the same security which could be to the detriment of the client in order to benefit the member of the firm.
- All financial planners with this firm will be Certified Financial Planners™ in good standing. This includes compliance with the Certified Financial Planning Board of Standards’ Code of Ethics and Professional Responsibility as well as the continuing education requirements of that certifying body.

- All financial planners with this firm will be members of the NAPFA and be in compliance with that organization's Fiduciary Oath and Code of Ethics as well as its continuing education requirements.
- None of the revenue for POMFP will be derived from sale of products, commissions, or referral fees. Also, no one at the firm will pay referral fees to obtain clients.
- Continuing education will be pursued, not only to meet the requirements of certifications and memberships, but to maintain professional competence and be aware of regulations and market trends that impact our clients.
- We will maintain the confidentiality of our clients in regard to their financial matters, disclosing nothing beyond the name of client except where we are otherwise authorized by the client or where we are required by law to disclose more.

Material/Proprietary Interests in Securities Recommended to Clients. The firm and its associated persons do not have any proprietary or material interest in or any role in the management of any companies or investments that we recommend to clients.

Participation or Interest in Client Transactions. POMFP and/or our associated persons may buy or sell some of the same securities for their own accounts that we recommend for purchase or sale to clients. When appropriate, we will purchase or sell securities for clients before purchasing or selling the same securities for our accounts or allowing our associated persons to purchase or sell the same securities for their own accounts. In some cases, the firm or its representatives may buy or sell securities for their own accounts for reasons not related to the strategies adopted for our clients. Our employees are required to follow our Code when making trades for their own accounts in securities which are recommended for purchase or sale to clients. The Code is designed to assure that the personal securities transactions of our associated persons will not interfere with decisions made in the best interest of advisory clients while at the same time, allowing our associated persons to invest their own accounts.

Item 12 - Brokerage Practices

Recommendation of Broker-Dealers; Directed Brokerage; Best Execution; Soft Dollars and other Benefits Received.

Unless we otherwise agree, as a condition of engaging our services, you will be required to independently engage the custodial and trade execution services of TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TDA"), an independent registered broker-dealer and Member FINRA/SIPC. We do not permit clients to direct brokerage to other broker-dealer firms. We are not affiliated with TDA and TDA does not monitor or control the activities of POMFP or its personnel. Your assets will be held in accounts maintained by TDA in your name. TDA will execute all transactions for your account and determine the commission rates to be charged in connection with such transactions. We may require our clients to use other broker-dealers or custodians in the future. Clients should note that assets contained in "held away" accounts (e.g., employer sponsored retirement plans, education savings plans, insurance products) on which we may offer advice may be held at custodians other than TDA.

Clients should be aware of the fact that not all investment advisors require their clients to use a particular broker-dealer firm for execution of transactions or custodial services. Because clients of our firm are typically required to open accounts with and use the custodial and brokerage services of TDA, we may not be able to achieve the lowest cost of execution of specific client transactions. Thus, our exclusive use of

TDA for custody and execution of client transactions may cost clients more money compared to other arrangements.

In recommending broker-dealers to clients (including TDA), POMFP will comply with its fiduciary duty to seek best execution and with the Securities Exchange Act of 1934 and will take into account such relevant factors as:

- Transaction costs;
- The custodian's facilities, technology, reliability and financial responsibility;
- The ability of the custodian to effect transactions, particularly with regard to such aspects as timing, order size and execution of order; and
- Any other factors that we consider to be relevant.

We will continue to recommend TDA to clients for custody and execution services so long as we believe that they continue to provide our clients with best execution in accordance with the above criteria.

While our firm does not receive fees, commissions, or client referrals from TDA (or any other broker-dealer or custodian) in exchange for trade executions, we do participate in TDA's "Institutional Program" as result of our recommendation of their execution and custodial services to clients. As a participant in this program, TDA provides independent investment advisors like us with services which include custody of securities, trade execution, clearance and settlement of transactions. POMFP receives some additional benefits from TDA through its participation in the program. Our receipt of these benefits creates conflicts of interest that are described below in Item 14. Please see Item 14, "Receipt of TDA Institutional Program Benefits," for further details.

Trade Aggregation. Due to our policy of managing client portfolios on a non-discretionary basis, POMFP does not aggregate purchases and sales and other transactions amongst client accounts. Our practice of not combining multiple clients' buy and sell orders (*i.e.*, block trading) may result in our firm being unable to achieve for its clients the most favorable execution at the best price available, and accordingly, may cost clients more money than other arrangements.

Item 13 - Review of Accounts

Account Reviews. POMFP maintains access to copies of client account statements and trade confirms through TDA. These are reviewed when an investment review is performed with a client or if requested by a client. Statements for accounts "held away" from the accounts over which POMFP is granted trading authority (e.g., employer sponsored retirement accounts, education saving accounts, insurance products) are not reviewed unless specifically provided by a client in preparation for a periodic investment review.

The firm views financial planning for its clients as an ongoing process. Accordingly, financial planning recommendations and plans are reviewed and updated as frequently as appropriate based on the client's unique financial circumstances or as reasonably requested by the client. These reviews typically occur at least annually but may occur more or less frequently for clients depending on their financial situations, assets, needs, and/or their responsiveness to our requests for information and/or to schedule such account reviews.

Reporting to Clients. For clients that maintain brokerage account(s), the custodian will independently provide an account statement at least quarterly which includes a list of all assets held in the account, asset values, and all transactions affecting the account assets, including any additions or withdrawals. These statements will also disclose the amount of any fees paid directly to our firm from the account (if the client elects to pay our fees via direct fee deduction). We may provide certain additional reports to clients upon request.

Item 14 - Client Referrals and Other Compensation

As described above, we are a fee only financial planning firm. We do not receive or accept any additional compensation as a result of the recommendation or sale of any securities or insurance products to our clients. We do not pay referral or finder's fees, nor do we accept such fees from any third parties. Compensation to the firm is wholly from advisory fees paid by our clients.

Receipt of TDA Institutional Program Benefits: As referenced in Item 12, POMFP participates in TDA's Institutional program and requires clients to engage TDA for custody and trade execution services. There is no direct link between TDA and POMFP in connection with the investment advice we provide to our advisory clients. Our firm receives economic benefits through the custody and operating relationships it has with TDA that are not typically available to retail investors. These benefits include the following products and services that are provided to us by TDA without cost or at a discount: duplicate client statements and confirmations, research related products and tools, consulting services, access to a trading desk serving POMFP's associated persons, 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 discounts or no fees on compliance, marketing, research, technology, and practice management products and services provided by certain third party vendors.

TDA may also pay for business consulting, professional services, and research received by POMFP and its associated persons and may also reimburse expenses (travel, lodging, meals, and entertainment expenses) for POMFP's personnel to attend conferences or meetings relating to their service platforms or to their advisor custody and brokerage services generally. POMFP's policy is not to accept reimbursement for admission to conferences, travel, lodging, meals, or entertainment expenses from TDA. Some of the products and services made available by TDA through the program may benefit our firm but may not benefit clients. These products or services may assist our firm in managing and administering client accounts, including accounts not maintained at TDA. Other services made available by TDA are intended to help POMFP manage and further develop its business enterprise. The benefits received by our firm and/or our associated persons through participation in their Institutional program do not depend on the amount of brokerage transactions directed to TDA.

As part of its fiduciary duties to clients, our firm endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by our firm and/or our associated persons in and of itself creates a potential conflict of interest and may indirectly influence POMFP's choice to recommend TDA to clients for custody and brokerage services. We will only continue to recommend TDA's services to clients where we believe they provide best execution of client transactions.

Item 15 - Custody

With the exception of our ability to directly debit fees as outlined in Item 5 of this brochure, we do not hold, directly or indirectly, any client funds or securities, or have any authority to obtain possession of them. All client investments are held at an independent qualified custodian (i.e., TDA). The custodian will provide account statements directly to the client at their address of record at least quarterly. In some cases, the client may request that the custodian provide statements electronically, instead of by regular mail. We urge all clients to carefully review such statements and compare such official custodial records to any statements or reports that we may provide.

We shall have no liability to you for any loss or other harm to any property in your account held by any custodian, including any harm to any property in the account resulting from the insolvency of any custodian or any acts of the agents or employees of any custodian, whether or not the full amount of such loss is covered by the SIPC or any other insurance which may be carried by such custodian. Clients understand that the SIPC provides only limited protection for the loss of property held by a custodian.

Item 16 - Investment Discretion

We manage client accounts exclusively on a non-discretionary basis. You will be required to execute a limited power of attorney authorizing POMFP to instruct your custodian to execute trades within your designated brokerage account(s) (i.e., trading authority). We will only instruct your custodian to execute trades after we have received your approval for our investment recommendations. We will not have investment discretion over your account. You may cancel our trading authority at any time by contacting us or the custodian of your account in writing.

Item 17 - Voting Client Securities

Clients are responsible for voting their own proxies. Advice is provided regarding proxy voting for investments upon request. Most clients will receive proxies and other solicitations directly from their custodian or transfer agent. If any proxy materials are received on behalf of a client, they will be sent directly to the client or a designated representative of the client, who is responsible to vote the proxy. We do not forward duplicative proxy materials to clients.

Item 18 - Financial Information

POMFP does not require or solicit prepayment of more than \$1,200 in fees per client, 6 months or more in advance. We do not maintain custody or discretionary authority over any client accounts. We are not subject to any financial commitments or conditions that are reasonably likely to impair our ability to meet our contractual and fiduciary duties to our clients.

POMFP has never been the subject of a bankruptcy petition.