

# Financial Independence, LLC

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February 11, 2021

## **FORM ADV PART 2A BROCHURE**

This brochure provides information about the qualifications and business practices of Financial Independence, LLC. If you have any questions about the contents of this brochure, please contact us at 401.681.4825. 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.

Additional information about Financial Independence, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Financial Independence, LLC is 150515.

Financial Independence, LLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

## Item 2 Summary of Material Changes

The material changes in this brochure from the last annual updating amendment of Financial Independence, LLC on January 17, 2020 are described below. Material changes relate to Financial Independence LLC's policies, practices or conflicts of interests.

- The firm has received a Paycheck Protection Program Loan. (Item 18)
- We removed all references to Betterment throughout this Brochure as we do not currently recommend that firm to our clients.
- We added language to Item 5 to clarify that clients on the AssetMark Platform do not incur separate transactions fees.
- We revised the language of Item 10 to clarify that we do not receive fees from third party advisers and our fee is does not vary depending on which strategist we recommend for a client's portfolio.
- We removed reference to economic benefits with TD Ameritrade.

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## **Item 4 Advisory Business**

### **Description of Services**

Financial Independence, LLC is a registered investment adviser based in Warwick, Rhode Island. We are organized as a limited liability company under the laws of the State of Rhode Island. We have been providing financial planning and investment advisory services since 2009. Rick W. Campbell is our firm's principal owner.

We provide a variety of planning and advisory services that are offered separately or through a wealth management service referred to as the Financial Independence Roadmap Program (also referred to as the Wealth Management Roadmap). The planning and advisory services, as well as asset management services offered through managed accounts on the AssetMark platform, are described in more detail below along with how these services are personalized to each individual client.

As used in this brochure, the words "we", "our" and "us" refer to Financial Independence, LLC and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm. Also, you may see the term Associated Person throughout this brochure. As used in this brochure, our Associated Persons are our firm's officers, employees, and all individuals providing investment advice on behalf of our firm.

### **Wealth Management Services**

#### ***Financial Planning Services***

We offer broad-based, modular, and consultative financial planning services. Financial planning will typically involve providing a variety of advisory services to clients regarding the management of their financial resources based upon an analysis of their individual needs. If you retain our firm for financial planning services, we will meet with you to gather information about your financial circumstances and objectives. Once we review and analyze the information you provide to our firm, we will deliver a written plan to you designed to help you achieve your stated financial goals and objectives. If you require advice on a more limited set of goals and objectives or a single aspect of your finances, we offer modular financial planning/general consulting services to address those specific areas. This could include, but not be limited to, asset allocation recommendations on your employer-provided retirement plans.

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide to our firm. You must promptly notify our firm if your financial situation, goals, objectives, or needs change. Certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. Past performance is in no way an indication of future performance. We cannot offer any guarantees or promises that your financial goals and objectives will be met.

You are under no obligation to act on our financial planning recommendations. Should you choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

#### ***AssetMark Platform***

We offer investment management services through a managed account program on the AssetMark Platform or ("AssetMark Platform"). The AssetMark Platform is an asset allocation program sponsored by AssetMark, an investment adviser registered with the Securities Exchange Commission. After gathering information about your financial situation and objectives, we will make recommendations regarding the suitability of an investment program based on factors such as investment strategy,

performance, and methods of analysis. We will recommend one or more discretionary portfolio strategists on the AssetMark Platform for your portfolio. We will monitor the performance of your account to ensure the performance and investment style remains aligned with your investment goals and objectives.

### **Pension Consulting Services**

We offer pension consulting services to employee benefit plans and their fiduciaries based upon the needs of the plan. In general, these services may include an existing plan review, asset allocation advice, assistance with fund selection and investment options, communication and education services to plan participants, investment performance monitoring, and/or ongoing consulting.

Pension Consulting services will be provided pursuant to the agreement entered into and within the parameters set forth in the plan documents. Where the plan sponsor engages our firm to provide advice to participants on an individual basis, such advice will be limited to general retirement planning issues, and fund selection and asset allocation of plan assets.

Client accounts are regulated under the Employee Retirement Income Securities Act ("ERISA"). Our firm will provide consulting services to the plan fiduciaries as described above. Typically, the named plan fiduciary must make the ultimate decision as to retaining the services of such investment advisers as our firm recommends. The plan fiduciary is free to seek independent advice about the appropriateness of any recommended services for the plan.

### *General - Advisory Services to Retirement Plans and Plan Participants*

As disclosed above, we offer various levels of advisory and consulting services to employee benefit plans ("Plan") and to the participants of such plans ("Participants"). The services are designed to assist plan sponsors in meeting their management and fiduciary obligations to Participants under the Employee Retirement Income Securities Act ("ERISA"). Pursuant to adopted regulations of the U.S. Department of Labor, we are required to provide the Plan's responsible plan fiduciary (the person who has the authority to engage us as an investment adviser to the Plan) with a written statement of the services we provide to the Plan, the compensation we receive for providing those services, and our status (which is described below).

The services we provide to your Plan are described above, and in the service agreement that you have previously signed. Our compensation for these services is described below, at Item 5, and also in the service agreement. We do not reasonably expect to receive any other compensation, direct or indirect, for the services we provide to the Plan or Participants, unless the plan sponsor directs us to deduct our fee from the plan or directs the plan record-keeper to issue payment for our fee out of the plan. If we receive any other compensation for such services, we will (i) offset the compensation against our stated fees, and (ii) we will promptly disclose the amount of such compensation, the services rendered for such compensation and the payer of such compensation to you.

### *Status*

We are registered as an investment adviser under the laws of the state of Rhode Island, and represents that it is not subject to any disqualification as set forth in Section 411 of ERISA.

In performing the Fiduciary Services, it is acting as a fiduciary of the Plan as defined in Section 3(21) under the Employee Retirement Income Security Act ("ERISA") for purposes of providing non-discretionary investment advice only.

### **Types of Investments**

We primarily offer advice on mutual funds and exchange-traded funds ("ETFs"); however, we may also

offer advice on equity securities, corporate debt securities, municipal securities, variable life insurance, variable annuities, and U.S. Government securities.

You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

### **Assets Under Management**

We have the following assets under management:

Discretionary Amounts:	Non-Discretionary Amounts:	Date Calculated:
\$0.00	\$176,343,523	December 2020

## **Item 5 Fees and Compensation**

### ***Financial Planning Fees***

We typically charge a fixed annual fee for financial planning services. In the first year, the fixed fee typically ranges from \$1,200 to \$10,000 depending on the scope and complexity of services. In the first year, the fixed fee is generally higher to account for the additional work associated with data gathering, initial client meetings, goal setting and prioritization, software input, account linking, data and plan assumption accuracy and completeness checks, initial financial statement development, digital vaulting of critical documents and other efforts to build the foundation for the initial plan. In subsequent years (years two and beyond), the ongoing fixed fee is often reduced and typically ranges from \$600 to \$5,000 per year, depending on the scope and complexity of services. There are situations where we charge the same or similar fee in the first year and subsequent years (years two and beyond) to accommodate client needs, objectives and personal situation. All fees are negotiable, transparent and disclosed upfront.

Payments for financial planning fees will be processed through a secure online third-party platform in monthly, quarterly or semiannual installments (at the client's preference). An online billing notice will be sent and payment will be due and payable upon receipt of such online billing notice. Fees will be charged in advance. Client will be provided relevant information regarding the online third-party billing platform during the account creation process. If a client does not want online billing, a manual billing process may be offered, and payment will be due and payable upon receipt of such billing notice.

We will not require prepayment of a fee more than six months in advance and in excess of \$500. If you are unsatisfied with your financial plan, for any reason, we may refund the fee you have paid to our firm.

We also allow clients to pay for financial planning services based on an hourly rate of \$250 per hour. In such cases, we will provide an estimate of the total fee at the start of the advisory relationship.

In certain situations where clients have long term relationships with the firm and/or have engaged the firm to provide investment management services on large account balances, we may, at our discretion, provide financial planning fees at no additional separate charge. Additionally, some clients may prefer that financial planning fees be included in the asset-based fee charged against investments, rather than a separate fixed fee. This is something we consider and may accommodate at our discretion. All advisory fees are fully disclosed upfront and transparent to clients.

### ***AssetMark Platform Fees***

We charge a fee ranging from 0.50% - 1.00% of our client assets on the AssetMark Platform, which is in addition to AssetMark's fees. AssetMark's fees are provided in detail in the AssetMark Platform Disclosure Brochure. Discretionary Manager Fee schedules are included in the AssetMark Platform fee indicated in the AssetMark Client Billing Authorization or the Appendix A to the AssetMark Client

Service Agreement. The total fees applicable to each Account on the AssetMark Platform include our fee and AssetMark's advisory fee.

Other fees for special services may also be charged. The determination of the applicable advisory fee is negotiable and will depend on factors such as the amount of assets managed on the AssetMark Platform, and the types of investment strategies and products of the portfolio model in which you participate. In certain circumstances, a portion of the account may not be subject to AssetMark's fees, in which case only our fee will apply. In addition, you may incur additional charges such as custodial fees that are separate and distinct from the advisory fees. You are encouraged to review the AssetMark Platform Disclosure Brochure for information regarding the AssetMark Platform and on the total fees charged. You should consider all applicable fees.

Our advisory fees are negotiable depending on the complexity and scope of services, your financial situation, and your objectives. Previous client relationships may be subject to a different fee schedule. Fees are quarterly in advance. You will be required to enter into an advisory agreement with our firm and a separate agreement with AssetMark. AssetMark's advisory agreement may be terminated in accordance with the terms set forth in the AssetMark Client Services Agreement. Pre-paid fees not yet earned will be refunded on a pro-rata basis.

As disclosed under the Financial Planning Fees section above, if you have engaged our firm for investment management services, you may elect to pay your financial planning fees as part of the asset-based fee charged under the AssetMark Platform. In such cases, the asset-based fee charged for investment management services under the AssetMark Platform will be higher than those fees stated above in an amount equal to the amount agreed to in the AssetMark Agreement.

### ***Pension Consulting Fees***

Our firm charges a fixed fee ranging from \$500 to \$5,000 for pension consulting services, which is negotiable depending on the complexity and scope of the engagement. Depending on the type of account, our firm may charge an asset-based fee ranging from 0.25% - 0.75%, which is negotiable based on the level of services provided. Fees are due quarterly or semi-annually in advance, depending on your preference.

### ***Payment of Fees***

We will typically send you an invoice for the payment of our advisory fee; however, with respect to accounts managed on the AssetMark Platform, AssetMark will deduct all investment advisory fees, including the portion payable to our firm, directly from your account through the qualified custodian holding your funds and securities. Our advisory fee will be deducted only when the following requirements are met:

- You provide AssetMark with written authorization permitting the fees to be paid directly from your account held by the qualified custodian.
- AssetMark will send you an invoice, on our firm's behalf, showing the amount of the fee, the value of the assets on which the fee is based, and the specific manner in which the fee was calculated.
- The qualified custodian agrees to send you a statement, at least quarterly, indicating all amounts dispersed from your account including the amount of the advisory fee paid directly to our firm.

We encourage you to reconcile our invoices with the statement(s) you receive from the qualified custodian.

If our disclosure brochure is not delivered to you within 48 hours prior to your entering into an advisory

agreement with our firm, you may terminate the agreement within five business days of the date of acceptance without penalty. If you received the disclosure documents 48 hours in advance or if the five-day grace period has expired, you may terminate the agreement by providing written notice to our firm. You will incur a pro rata charge for services rendered prior to the termination of the agreement. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

### **Additional Fees and Expenses**

As part of our investment advisory services to you, your portfolio may be invested in mutual funds, exchange traded funds, and other investment products that charge additional fees. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders, or other investment products. These fees will generally include a management fee and other fund expenses. You may also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian and clients on the AssetMark Platform do not incur any transaction charges. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the "Brokerage Practices" section of this brochure.

### **Compensation for the Sale of Insurance Products**

Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

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

We do not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Our fees are calculated as described in the **Advisory Business** section above and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

## **Item 7 Types of Clients**

We offer investment advisory services to individuals, pension and profit-sharing plans, trusts, estates, and charitable organizations.

In general, we require a minimum of \$500,000 to open and maintain an advisory account. At our discretion and with consideration of the overall client relationship to the firm, we may waive this minimum account size. In addition, Assetmark may impose a minimum account size, depending on the program in which your account is placed. These minimums are described in more detail in the



AssetMark Platform Disclosure Brochure. Accounts below the stated minimums may be accepted on an individual basis at the discretion of AssetMark.

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

We do not directly manage client portfolios but will select and recommend other investment advisers (managers) to manage client portfolios. Although we will seek to select only advisers who will invest clients' assets with the highest level of quality and integrity, our selection process cannot ensure that those advisers will perform as desired and we will have no control over the day-to-day operations of any of its selected advisers. In selecting and monitoring the advisers we recommend, we do consider their breadth and depth of management expertise, investment philosophy and asset allocation approach, investment process, performance track record and risk return characteristics, policies and procedures and overall reputation in the industry. We would not necessarily be aware of certain activities at the underlying adviser level, including without limitation an adviser engaging in unreported risks, investment "style drift" or even regulator breach or fraud. In monitoring and analyzing the third-party advisers, we use benchmarking analysis, assessing whether the adviser's performance has met, exceeded, or fallen short of comparable benchmarks (e.g., Russell 2000, S&P 500, etc.), together with comparison against any stated benchmarks the adviser has set for itself.

After gathering information about the Client's financial situation and objectives, we will make recommendations regarding the suitability of an investment program of the other adviser based on factors such as investment strategy, performance, and methods of analysis. The method of selecting third party advisors (i.e., investment management strategists) starts with our overall investment philosophy, which is founded on the following beliefs:

1. A primary obstacle to financial and investment success is human psychology and emotion. Humans are hardwired to avoid pain and pursue pleasure and security. Investors are not always rational, have limits to their self-control, and are influenced by their own biases which can lead to mistakes. To be successful, our investment approach must consider and address the tendencies of human psychology, emotion and behavior. A systematic investment process and approach, along with behavioral coaching, can help remove emotion from the decision-making process, and increase the likelihood of long-term investment success.
2. Investors are continually bombarded with increasing volumes of headlines, news and data through social media, news apps, and other non-traditional mediums of communication. Information overload can lead to increased anxiety and fear, rather than reasoned thought. Tuning out the "noise" in communication channels can also help investors manage their emotions and behaviors.
3. The achievement of desired goals and objectives matters more than comparing to and beating market related benchmarks.
4. The future and markets are unpredictable, and it is better to prepare for multiple possible scenarios (i.e., bull markets and bear markets) than to take an absolute position either way. Attempts to accurately and consistently predict the future or direction of the economy and markets are fraught with peril.
5. During bear markets, professionally managed tactical asset allocation and actively managed investments can be a more effective approach than strategic, passively managed approaches.
6. During bull markets, professionally managed strategic asset allocation and passively managed investments can be a more effective approach than tactical, actively managed approaches.

7. A broad and deep team-based approach of using multiple investment managers can help address the ever-changing and volatile investment landscape, and mitigate various risks, including the risk of loss.

8. While the diversification of underlying investments is very important, the diversification of managers and the combination of various asset allocation approaches can help to manage volatility and reduce the risk of material investment mistakes.

9. Investment goals and objectives are more likely to be achieved with lower cost approaches and where applicable, tax sensitive investment strategies.

Methods of analysis and investment strategies will be employed by the other advisers based on their own methodology.

### **Risk of Loss**

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

### **Recommendation of Particular Types of Securities**

As disclosed under the "Advisory Business" section in this brochure, we primarily recommend mutual funds and exchange-traded funds. Mutual funds and exchange traded funds ("ETFs") are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. Exchange traded funds differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. We only recommend "no load" mutual funds, which charge no fee to buy into, or sell out of, the fund. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely which can dilute other investors' interests.

## **Item 9 Disciplinary Information**

Neither our firm nor any of our Associated Persons has any reportable disciplinary information.

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

We have not provided information on other financial industry activities and affiliations because we are not affiliated, through control or ownership, with any of the types of entities listed below.

1. broker-dealer, municipal securities dealer, or government securities dealer or broker
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and

- offshore fund)
- 3. other investment adviser or financial planner
- 4. futures commission merchant, commodity pool operator, or commodity trading advisor
- 5. banking or thrift institution
- 6. accountant or accounting firm
- 7. lawyer or law firm
- 8. insurance company or agency
- 9. pension consultant
- 10. real estate broker or dealer
- 11. sponsor or syndicator of limited partnerships

### **Recommendation of Other Advisers**

As described in Item 4, we may recommend one or more discretionary strategists on the AssetMark Platform for your portfolio. In addition to our advisory fee, you will pay a Platform Fee to AssetMark which includes fees paid to the strategists. While the Platform Fee varies based on the strategist recommended for your portfolio, our advisory fee does not and is the same regardless of the strategist(s) we recommend to you.

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

### **Description of Our Code of Ethics**

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Associated Persons are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

### **Participation or Interest in Client Transactions**

Neither our firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

## **Item 12 Brokerage Practices**

### **Recommendation of Broker-Dealers**

We recommend the brokerage and custodial services of TD Ameritrade. Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. In recognition of the value of the services the Custodian provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, the most favorable compared to other available providers and their services. We consider various factors, including:

- Capability to buy and sell securities for your account itself or to facilitate such services.

- The likelihood that your trades will be executed.
- Availability of investment research and tools.
- Overall quality of services.
- Competitiveness of price.
- Reputation, financial strength, and stability.
- Existing relationship with our firm and our other clients.

In providing investment management services through the Assetmark Platform, we may assist you in selecting the risk/return objective and portfolio strategists that best suit your objectives. You then specifically direct the account to be invested in accordance with the chosen investment solution. When you select the investment solutions, you further direct that the account be automatically adjusted to reflect any adjustment in the asset allocation by the selected portfolio strategist. This authorization results in the purchase and sale of certain mutual funds or ETFs (or transfers between variable annuity sub-accounts) without your further authorization or any other party at such time as the portfolio strategist changes the composition of the selected model asset allocation.

You will receive confirmation of all transactions in the account and are free to terminate participation in the Assetmark Platform and retain or dispose of any assets in the account at any time. With your approval, we may instruct AssetMark to change the selected model asset allocation for your account or to make the purchase or sale of securities in your account.

Depending on the program you select with the Assetmark Platform, third party discretionary portfolio strategists are granted the authority to manage the accounts on a discretionary basis, including the authority to buy, sell, select, remove and select securities and other investments for the account, and to select broker-dealers or others through which transactions will be effected.

#### **Research and Other Soft Dollar Benefits**

We do not have any soft dollar arrangements.

#### **Economic Benefits**

As a registered investment adviser, we have access to the institutional platform of your account custodian. As such, we will also have access to research products and services from your account custodian and/or other brokerage firm. These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms and are not considered to be paid for with soft dollars. However, you should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.

#### **TD Ameritrade Institutional**

We participate in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. We receive some benefits from TD Ameritrade through our participation in the Program.

As disclosed above, we participate in TD Ameritrade's institutional customer program and we may recommend TD Ameritrade to you for custody and brokerage services. There is no direct link between

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

#### **Brokerage for Client Referrals**

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

#### **Directed Brokerage**

We routinely require that you direct our firm to execute transactions through TD Ameritrade. As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage commissions than you might otherwise pay through another broker-dealer that offers the same types of services. Not all advisers require their clients to direct brokerage.

#### **Block Trades**

We do not combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading") because we invest solely in Mutual Funds which do not trade in blocks.

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

If you participate in the Assetmark Program, Rick W. Campbell, President, Mark A. Lavallee, Vice President, and/or Kevin Pierro, Financial Consultant, will monitor their respective accounts to ensure the performance and investment style remains aligned with your investment goals and objectives. We request that clients meet with us at least annually for a formal account review. Such reviews include a review of investment objectives, time horizon, risk tolerance, third party management strategies, account balances, account holdings, asset allocation, account performance, and advisory fees. Triggering factors that may stimulate a review include, but are not limited to, life changing events, change in employment status, changes in your investment objectives, income and cash flows, family status, disposition of assets, gifts or inheritances and health status. You are responsible for informing us of such triggering factors.

We do not provide you with additional or regular written reports in conjunction with account reviews

that are generated by our firm. If you participate in the Assetmark Program, you will receive periodic custodial account statements (not less frequently than quarterly) from your account Custodian and Quarterly Performance Reviews. We may review these reports with you during our client review meeting.

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

### **TD Ameritrade Institutional Customer Program**

As disclosed above under *Item 12 Brokerage Practices*, we participate in TD Ameritrade's Institutional Customer Program ("Institutional Program ") and we may recommend TD Ameritrade to clients for custodial and brokerage services.

We do not compensate any individual or firm for client referrals.

With respect to the AssetMark Platform, we may, subject to negotiation with AssetMark, receive certain allowances, reimbursements or services from AssetMark in connection with our investment advisory services to our clients, as described below and in further detail in the Appendix 1 of the AssetMark Platform Disclosure Brochure.

In connection with the Assetmark Program, Assetmark may provide our firm with a quarterly business development allowance in the amount of \$25,000 per year for reimbursement for qualified marketing/practice management expenses incurred by our firm.

#### **MARKETING SUPPORT**

We may enter into marketing arrangements with AssetMark whereby we receive compensation and/or allowances in amounts based either upon a percentage of the value of new or existing account assets of clients referred to AssetMark by our firm, or a flat dollar amount.

#### **DIRECT AND INDIRECT SUPPORT**

AssetMark may sponsor annual conferences for participating Financial Advisory Firms and/or Financial Advisors designed to facilitate and promote the success of the Financial Advisory Firm and/or Financial Advisor and/or AssetMark advisory services.

#### **DISCOUNTED FEES FOR FINANCIAL ADVISORS**

Financial Advisors may receive discounted pricing from AssetMark for practice management and marketing related tools and services.

#### **COMMUNITY INSPIRATION AWARD**

AssetMark offers the Community Inspiration Award to honor selected Financial Advisors across the US who have inspired others by supporting charitable organizations in their communities. AssetMark will make a cash donation, subject to the published rules governing the program, to our firm's nominated charity in accordance with guidelines as outlined in the AssetMark Platform Disclosure Brochure.

## **Item 15 Custody**

Typically, we will invoice you for the payment of our fees. If you participate in our investment management services through the AssetMark Platform, AssetMark will deduct both our fee and AssetMark's fee from your account simultaneously. That firm will then pay us our advisory fee. AssetMark will send you an invoice, on our firm's behalf, showing the amount of the fee, the value of the assets on which the fee is based, and the specific manner in which the fee was calculated. We encourage you to reconcile our invoices with the statement(s) you receive from the qualified



custodian.

We do not exercise custody over your funds or securities. Your funds and securities will be held with a bank, broker-dealer, or other qualified custodian. You will receive account statements from the qualified custodian(s) holding your funds and securities. If you have a question regarding your account statement or if you did not receive a statement from your custodian, contact your custodian directly. If you participate in the AssetMark Platform, we encourage you to reconcile our invoices with the statement(s) you receive from the qualified custodian.

## **Item 16 Investment Discretion**

We do not take any independent discretionary authority over client accounts.

## **Item 17 Voting Client Securities**

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

## **Item 18 Financial Information**

We are not required to provide financial information to our clients because we do not:

- require the prepayment of more than \$500 in fees and six or more months in advance, or
- take custody of client funds or securities, or

In light of the COVID-19 coronavirus and historic decline in market values, Financial Independence has elected to participate in the CARES Act's Paycheck Protection Program ("PPP") to strengthen its balance sheet. Financial Independence intends to use this loan predominantly to continue payroll for the firm and cover PPP eligible overhead costs; and may ultimately seek loan forgiveness per the terms of the PPP. Due to this and other measures taken internally, Financial Independence has been able to operate and continue serving its clients

## **Item 19 Requirements for State Registered Advisers**

Neither our firm, nor any of our Associated Persons are compensated for advisory services with performance-based fees. Please refer to the "Performance-Based Fees and Side-By-Side Management" section above for additional information on this topic.

Neither our firm, nor any of our Associated Persons have any reportable arbitration claims, civil, self-regulatory organization proceeding or administrative proceeding.

Neither our firm, nor any of our Associated Persons have a material relationship or arrangement with any issuer of securities.

Refer to the Part(s) 2B for background information about management personnel and those giving advice on behalf of our firm.

## **Additional Information**

**Your Privacy**

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

**Class Action Lawsuits**

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.