

Financial Abundance, Inc.

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This disclosure brochure provides clients with information about the qualifications and business practices of Financial Abundance, Inc. a Registered Investment Advisory firm registered with the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

It also describes the services Financial Abundance, Inc. provides as well as background information on those individuals who provide investment advisory services on behalf of Financial Abundance, Inc.

Please contact Ashton Immel, at 814-867-5745 or ashton@financialabundanceinc.com if you have any questions about the contents of this disclosure brochure.

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 Financial Abundance, Inc is available on the SEC website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number.

The CRD number for Financial Abundance, Inc. is 143300.

Item 2 – Material Changes

If any of the content of our Brochure is materially changed, we will ensure that all current Clients receive a copy of a revised Brochure along with a Summary of Material Changes within 120 days of the close of our business' fiscal year.

Since our last filing on March 29, 2021, our firm has had the following Material Changes:

September 2021– Advisory Business

Our firm added Discretionary Investment Management and Sub-Advisory services.

February 2022 – Our firm registered with the United States Securities and Exchange Commission (“SEC”).

February 2022 – Ashton Immel was named Chief Compliance Officer of Financial Abundance, Inc.

Whenever required, we will provide ongoing disclosure information about material changes and will provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Ashton Immel, at 814-867-5745. Brochures are provided free of charge.

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Item 4 – Advisory Business

ADVISORY BUSINESS

Company

Financial Abundance, Inc., also referred to as FAI in this brochure, is a fee-only holistic financial planning firm that specializes in financial planning and investment advisory services to individuals and families. Financial Abundance was established in 2007 by Paul Nichols after several years working with traditional brokerage firms. Financial Abundance offers a wide range of financial services. Distinguishing itself from traditional investment advisory firms by providing a holistic, unique educational process designed to enable clients to make key decisions in the area of investment needs, as well as income planning, specialized tax planning, estate planning, risk management, retirement planning, and business development needs.

Advisor and Client will enter into an Agreement which details the scope of the relationship and responsibilities of both Financial Abundance and Client. Advice and services provided under the agreement are tailored to the stated objectives of the Client(s).

Services

Investment Wealth Management and Supervision Services

Financial Abundance manages advisory accounts on a discretionary basis. For discretionary accounts, once we have determined a profile and investment plan with a client, we will manage the portfolios, through a Sub-Advisor. With our discretionary relationship, we will make changes to the portfolio as we deem appropriate, without having to obtain client consent, but within the expected investment guidelines. During personal discussions with clients, we determine the client's objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review a client's prior investment history, as well as family composition and background. Based on client needs, we develop a client's personal profile and investment plan to meet the clients' objectives. We then implement and manage the client's portfolio based on that policy and plan. We tailor our advisory services to meet the needs of our clients and seek to ensure that your portfolio is managed in a manner consistent with those needs and objectives. It is the client's obligation to notify us immediately if circumstances have changed with respect to their goals. Once we have determined the types of investments to be included in a client's portfolio and have allocated the assets, we provide ongoing investment review and management services.

Clients have the ability to maintain legacy positions or invest in limited amounts of securities. You are advised and are expected to understand that our past performance is not a guarantee of future results. Certain market and economic risks exist that adversely affect an account's performance. This could result in capital losses in your account.

Sub-Advisory Services

Financial Abundance has established relationships with an independent registered investment advisor ("Sub-Advisor") to carry out Sub-Advisor services for certain clients deemed appropriate. Financial Abundance utilizes the services of the Sub-Advisor for implementing the strategy of managing a client's portfolio. Financial Abundance will maintain discretionary authority over the use of the Sub-Advisor and the client's selection of strategy used and implemented within the portfolio.

Selected Sub-Advisors are evaluated by us for use in a client's account. Sub-Advisors selected by us may offer multiple strategies. Our Firm will monitor Sub-Advisors to ensure that they adhere to the

philosophy and investment style for which it was selected and to ensure that its performance, portfolio strategies, and management remain aligned with the client's overall investment goals and objectives. We will retain discretionary authority to hire and fire the Sub-Advisor. Our ongoing review includes, but is not limited to, assessment of the Sub-Advisor's disclosure brochure, performance information, materials, personnel turnover, and regulatory events.

Co-Advisory Services

Financial Abundance has entered into a Co-Advisor Agreement with Matson Money, Inc. ("Matson Money"). Matson Money, a privately held Ohio corporation, is registered as an investment advisor with the U.S. Securities and Exchange Commission. Financial Abundance and Matson Money are not related entities; neither has an ownership interest in the other, nor does any member or shareholder of either entity own an interest in the other. Both Financial Abundance and Matson Money provide their respective services to clients other than the joint clients that are subject to the Co-Advisor Agreement.

Under the Co-Advisor Agreement, Financial Abundance provides to joint clients Investment Consulting and Monitoring Services, which include the following:

- Advice on Asset Allocation
- Recommendations on an investment strategy
- Assistance in the preparation of an investment policy statement and any restrictions
- Evaluation of each client's historical investment performance
- Performance monitoring and continuing Private Investor Education classes 3 times a year in April, July, and November
- Controlling and measuring investment expenses.

Other Services:

- Investment Planning/Investment Policy Statements
- Financial Independence/Retirement Planning
- Capital Needs Analysis (Goal Funding)
- Income Tax Planning
- Estate Planning
- Education Planning
- Risk Management (Life, Long-Term Care, and Disability Insurance)
- Employee Stock Option Planning
- Other Projects (Described as "additional financial planning services" on Schedule A)

Clients that wish to participate in the Matson Fund Platform may enter into a tri-party agreement with Matson Money and Financial Abundance as co-advisers. Under these co-advisor agreements, Matson Money is the discretionary adviser to your account. They are granted discretionary authority to invest Client assets in the Funds based on Client responses to the questionnaire and to use temporary cash sweep vehicles as appropriate. The co-advisers, Financial Abundance, serves as non-discretionary advisers to the Clients they refer to us. The tri-party agreement covers the relationship between and among Matson Money, the co-adviser and you. Since many co-advisers are state registered and subject to the investment adviser laws of their state of registration, some Clients are required to execute an addendum to the standard tri-party agreement. The various state addendum contain language required by certain state regulators and are generally intended to clarify or maintain certain Client rights under applicable state law.

Matson Fund Platform

Matson Fund platform adheres to the Free-Market Portfolio Theory. The Free-Market Portfolio Theory is the synthesis of three academic principles: Efficient Market Hypothesis, Modern Portfolio Theory, and The Three-Factor Model. Together these concepts form a powerful, disciplined, and diversified approach to investing. The result is globally diversified portfolios including over 12,000 equities spread across forty-five countries, designed, and engineered to capture market rates of turnover specific time horizons.

<u>Model Portfolio</u>	<u>Asset Allocation</u>
Aggressive Growth	95% equities / 5% fixed income
Long-Term Growth	85% equities / 15% fixed income
Long-Term Growth	75% equities / 25% fixed income
Balanced Growth	60% equities / 40% fixed income
Balanced Growth	50% equities / 50% fixed income
Balanced Growth	40% equities / 60% fixed income
Income and Growth	25% equities / 75% fixed income
Fixed Income	0% equities / 100% fixed income

Each model portfolio corresponds to some combination of investments in the Free-Market Funds, or a variable insurance product invested in approximately the same combination of Matson Money Funds. Clients determine their investment objectives and most appropriate model portfolio combination through the questionnaire process with their co-advisor but are not otherwise permitted to impose restrictions on their accounts given that the accounts are invested in mutual funds subject to their own inherent investment restrictions.

Each Fund Matson manages is a "fund of funds" that invests primarily in shares of various Dimensional Fund Advisors (DFA) no-load mutual funds. They identify Clients' investment objectives based on the questionnaires described above, and, as currently managed, each Client account is generally assigned to one of the eight model portfolios outlined in the Matson Fund Platform above, each model portfolio typically represents direct investments in anywhere from 8 to 15 different DFA mutual funds, rather than shares of the Free-Market Funds or variable insurance products with underlying investments in the Matson Money Funds. Most of the DFA mutual funds we select are structured portfolios that invest in securities comprising a particular index, asset class or segment of the market and are not actively managed.

When imposing reasonable restrictions for their accounts, clients may request that particular securities or types of securities not be purchased, or that such securities are to be sold if held in the account. However, clients cannot request that particular securities be purchased for their account. Restrictions may only be imposed at the fund level itself. Matson Money reserves the right to reject any account for which unreasonable or overly restrictive conditions are requested.

Educational Services

Financial Abundance provides educational workshops for those desiring information on personal finance and investing. Topics may include issues related to general financial planning, educational funding, estate planning, retirement strategies, implications involving changes in marital status, and various other current economic or investment topics. Our workshops are educational in nature and do not involve the sale of insurance or investment products.

Termination of Client Relationship

A client agreement may be canceled by either party, for any reason upon thirty (30) days prior written notice to the other party.

Assets Under Management

As of February 17, 2022, our Firm manages \$ 161,991,842 in discretionary assets.

Item 5 – Fees and Compensation

Investment Management and Sub-Advisor Services

Our Firm charges a fee as compensation for providing Investment Management services on your account. These services include advisory services, trade entry, investment supervision, and other account maintenance activities. Cash and cash equivalents are included in the calculation of advisory fees, unless otherwise noted and agreed to in the executed Agreement. Our recommended custodian will charge an asset-based fee which would include custodial fees, and administrative fees or commissions. See Additional Fees and Expenses below for details.

As discussed in Item 4 above, there are occasions where Sub-Advisor acts in a Sub-Advisor capacity to our Firm. Under this arrangement, the Sub-Advisor invests the assets based upon the parameters provided by our Firm. Depending on the agreement with the Sub-Advisor, the total advisory fee will be collected by the custodian and the portion of the advisory fee is sent to the Sub-Advisor and our Firm. This total fee includes our Firm's portion of the investment advisory fee as well as the Sub-Advisor's fee. The fee billed is defined in the relevant Investment Management Contract as well as in the individual Form ADV Filing of the respective Sub-Advisor. Our fees are outlined as follows:

<i>Total Advisory Fee includes the following:</i>	Financial Abundance, Inc. Advisory Fee	Sub-Advisory Fee	Total Advisory Fee
Under \$500k	1.00%	0.25%	1.25%
\$500k – \$1 million	0.85%	0.25%	1.10%
\$1 million - \$4 million	0.65%	0.25%	0.90%
\$4 million and above	0.45%	0.25%	0.70%

Sub-Advisors do not have any direct contact with our clients and all communication is through FAI. Upon entering into an agreement for advisory services with us, clients authorize us to use these Sub-Advisors to service their account, including executing trades, billing, and the deduction of fees from client accounts. Clients agree to allow us to share non-public, personal information with these unrelated third-party service providers for the purpose of administering and managing the clients' accounts.

The Sub-Advisor's relationship may be terminated at our Firm's discretion. We may at any time terminate the relationship with a Sub-Advisor. We will notify you of instances where we have terminated a relationship with any Sub-Advisor(s) you are investing with. Factors involved in the termination of a Sub-Advisor may include a failure to adhere to their stated management style or your objectives, a material change in the professional staff of the Sub-Advisor, unexplained poor performance, unexplained inconsistency of account performance, or our decision to no longer include the Sub-Advisor on our

approved list.

Engagement Retainer

Services under the Engagement Retainer are typically provided on a one-time flat-fee basis. The range of fees for the Engagement Retainer is \$500 - \$5,000 subject to complexity. The engagement fee includes coaching of intellectual property, tools, books, CD's, PowerPoint presentations, analysis reports specifically tailored to clients' needs. This planning process centers around a roadmap that is discussed, prepared, and clarified with client. The roadmap will then direct the clients educational, examination process. A total of 4-8, one-hour, face-to-face conversations are provided to direct and complete the project. Any future planning/advise will not be subject to an hourly rate, as it is covered by the initial flat fee and standard retainer fee.

Advisor will prepare a written financial plan for all financial planning Clients. The plan includes gathering all information necessary to provide Client with appropriate and agreed upon services, which may include one or more of the following: budgeting and cash flow planning, disability planning and income protection, debt management, estate planning, business succession planning, retirement planning and investment planning. The plan considers all Client assets, liabilities, goals, and objectives.

Matson Money Co-Advisor

Clients choosing this service will enter into a three-party agreement with Financial Abundance and Matson Money, under which Matson Money is granted discretionary authority to invest client assets. Before opening an account, the client must complete a program questionnaire or similar account owner profiling tool (questionnaire) with the assistance of Financial Abundance. In addition to the questionnaire, the client will be asked to provide detailed information about all the client's current holdings including, if applicable, an investment policy statement.

Clients pay co-advisory fees generally in line with the following representative fee schedule:

<i>Total Co-Advisory Fee:</i>	Financial Abundance, Inc. Advisory Fee	Total Advisory Fee
First \$500k	1.00%	1.00%
Next \$500k – \$1 million	0.85%	0.85%
Next \$1 million - \$4 million	0.65%	0.65%
Next \$4 million and above	0.45%	0.45%

All fees collected by the custodian (Charles Schwab or TIAA-CREF), for the co-advisor Financial Abundance and for Matson Money, are payable quarterly in advance in increments of one-fourth the annual rate. These fees are deducted directly from the clients' assets and are not billed. Fees are generally based upon the value of an account as of the last business day of each quarterly period.

However, when a client adds assets to, or withdraws assets from, an account during the quarter, we refund a portion of your fee for withdrawals (on a prorated basis), and we charge an additional fee for

additions to your account (also on a prorated basis). We will make any applicable refunds or collect additional fees within 90 days of our receipt of notice of each withdrawal or addition.

A Client's initial fee is based on the value of the account at the time of inception of our relationship with the Client and is prorated for the number of the days remaining in that quarter. In calculating the initial fee, we consider the inception date to be the date(s) a client's assets first become available for us to manage. Sometimes, a new Client's assets become available for us to manage on various dates during the first quarter. This can happen, for example, due to difficulties in transferring assets to a new custodian. In these instances, we charge an initial fee at the time of each contribution, prorated from the date the contributed assets become available until the end of the quarter.

Example: If a portion of an account's assets become available for management on December 15 of a given year and another portion of the account's assets become available for our management on February 15 of the following year, we will base our first fee on the value of the assets placed under management on December 15 and prorate that amount for the fifteen days remaining in the quarter. We will charge an additional fee on assets placed under management on February 15 and prorate that fee for the 45 days remaining in that quarter. Thus, during the first quarter of the following year, the account will be paying a fee for the entire quarter on the value of the assets under management on December 31 of the prior year, and a prorated fee on the additional assets from February 15.

In the event of a client terminating a financial planning project prior to the project being completed, a refund of any unearned fees will be paid to Client within (30) days of the reason for termination in writing. For refund purposes, "unearned fees", will be calculated as the amount of money paid to the advisor (less the advisors time and effort devoted to the project) prior to the early termination. Financial Abundance retains the right to modify planning fees in its sole and absolute discretion, on a client-by-client basis based on the size, complexity and nature of the advisory services provided. Fees are not negotiable.

The fee also includes the time and activities necessary to work with Client's attorney and/or accountant in reaching agreement on solutions, as well as assisting those advisors in implementation of all appropriate documents. The Advisor is not responsible for attorney or account fees charged to Client as a result of the above activities. Clients are encouraged to review their plans on a regular basis, based on individual circumstances.

Clients have five business days to cancel the contract, without penalty.

Educational Services

Our workshops are educational in nature and do not involve the sale of insurance or investment products. Financial Abundance charges a \$49 tuition for our educational seminars & workshops.

Important Additional Information

Mutual Fund Fees - All fees paid to Financial Abundance for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses. The fees for monitoring client assets are in addition to the fees included in the internal expenses of those funds' fees paid to their own investment Sub-Advisors, which are fully disclosed in each fund's prospectus and statement of additional information. Accordingly, the client should review both the fees charged by the funds and the fees charged by Financial Abundance to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

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

Financial Abundance does not accept performance-based fees (e.g., fees based on a share of capital gains on, or capital appreciated of the assets in a client's account).

Item 7 – Types of Clients

Financial Abundance provides investment advisory services to individuals (including high net worth individuals), pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other types of business entities.

Conditions for Managing Accounts

Financial Abundance requires a minimum asset level of \$50,000 and retains the right to modify said minimum level in its sole discretion, on a client-by-client basis.

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

Types of Investments

Investment advice may be offered on any investments held by a client at the start of the advisory relationship. Recommendations for new investments will typically be limited to domestic and foreign equity securities, warrants, corporate debt securities, municipal and United States government securities, exchange traded funds (ETFs) and mutual funds.

Security Analysis

Financial Abundance's approach to asset allocation is influenced by the work of Nobel Prize laureates William Sharpe and Harry Markowitz, who shaped the role of financial science in investing through their development of Modern Portfolio Theory. The principal goal of Modern Portfolio Theory is to achieve the greatest return for amount of risk taken (or, conversely, to minimize the risk in a portfolio targeted to achieve a specific return).

Doing so requires combining asset classes in the portfolio using structured asset class funds to achieve effective diversification. This is accomplished by measuring the correlation between specific asset classes that demonstrate a historically high rate of return and combining the asset classes in such a way that portfolio volatility is minimized. Global diversification of the portfolio may protect investors from a downturn in any single asset class, domestic or foreign.

Financial Abundance employs a "buy and hold" approach to asset management. The practice of this style of asset management is based on the belief that market timing is not proven as successful. The focus for the investor should be how much the investor can risk losing and how long they are willing to stay invested in the market.

Financial Abundance adheres to the following principles:

- Markets are efficient and for investing purposes assets are fairly priced.
- Diversification reduces the risk of uncertainty and asset allocation in numerous asset classes determines results in the portfolio.

Risk

Investment returns are not guaranteed, and our clients may lose money on their investments. It is very important that the client work with their coach to help understand the clients' risk tolerance. Investing in securities involves risk of loss that Clients should be prepared to bear as a result of idiosyncratic and systemic risks associated with a host of concepts such as: particular issuers, market sectors, market conditions, exchange rules, political developments, governmental intervention, currency fluctuations, natural disasters, and other unpredictable events, amongst others.

Typical investment risks include market risk typified by a drop in a security's price due to a company specific event (e.g., unsystematic risk), or general market activity (e.g., systematic risk). In addition, certain strategies may impose more risk than others. For example, with fixed income securities, a period of rising interest rates could erode the value of bond since bond values generally fall as bond yields rise. Investment risk with international equities also includes fluctuation in currency values, differences in accounting and economic and political instability. Depending upon the client need and investment mandate, Financial Abundance will attempt to thoroughly explain the applicable risks. Past performances have no guarantee of future results.

Item 9 – Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Financial Abundance. Neither Financial Abundance nor any of its supervised persons have ever been disciplined by a regulatory agency.

Item 10 – Other Financial Industry Activities and Affiliations

In addition to his duties as the President of Financial Abundance, and his duties as an Investment Advisor Representative for Financial Abundance, Mr. Nichols, President of EDI, is also an independent insurance producer, and is licensed as an insurance agent by the State of Pennsylvania and several other states in the disciplines of life, health, disability, variable, and long-term care insurance. Ms. Seaward and Mr. Immel are also licensed independent insurance producers for PA.

Mr. Nichols may conduct insurance business through EDI with advisory as well as non-advisory clients and is permitted to receive commissions or fees from outside sales of insurance products, including life insurance, long term care insurance, long term disability insurance, and fixed and immediate annuities, and indexed annuity products. Ms. Seaward and Mr. Immel do the same individually.

Mr. Nichols, Ms. Seaward, and Mr. Immel devote approximately 10% of his time each month on these business activities.

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

Financial Abundance has adopted a Code of Ethics to prevent violations of federal securities laws. The Code of Ethics is predicated on the principle that Financial Abundance and its employees owe a fiduciary duty to its clients. Accordingly, Financial Abundance expects all employees to act with honesty, integrity, and professionalism and to adhere to federal securities laws. Financial Abundance and its employees are required to adhere to the Code of Ethics. At all times, Financial Abundance and its employees must (i) place client interests ahead of Financial Abundance's; (ii) engage in personal investing that is in full compliance with Financial Abundance's Code of Ethics; and (iii) avoid taking advantage of their position.

Clients and prospective clients may request a copy of Financial Abundance's Code of Ethics by contacting Mr. Paul Nichols, Founder and President of Financial Abundance, at 814-867-5745.

All the individuals associated with the firm do personally own one of the same mutual fund portfolios that they recommend to clients.

Item 12 – Brokerage Practices

Financial Abundance recommends that clients utilize the custody, brokerage and clearing services of independent and unaffiliated FINRA-registered broker-dealers (“Pershing” or “Custodians”) for investment management accounts. We may recommend that you establish accounts with these custodians to maintain custody of your assets and to effect trades for your accounts.

We are independently owned and operated and not affiliated with these custodians. They provide us with access to their institutional trading and custody services. These services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors.

We will recommend that you establish accounts with Pershing to maintain custody of your assets and to effect trades for your accounts. You have the right to not act upon any recommendations. Our recommendation is generally based on the custodians’ cost and fees, skills, reputation, dependability, and compatibility with the client. You may be able to obtain lower commissions and fees from other brokers and the value of products, research and services given to us is not a factor in determining the selection of custodian or the reasonableness of their commissions.

The Sub-advisor will place trades for your account subject to our duty to seek best execution and other fiduciary duties. You may be able to obtain lower commissions and fees from other brokers and the value of products, research and services given to us is not a factor in determining the selection of custodian or the reasonableness of their commissions. The custodian's execution quality may be different than other custodians.

For our client accounts maintained in custody with a custodian, the custodian generally does not charge separately for custody but may be compensated by account holders through 12b-1 fees and ticket charges.

The custodian we utilize makes available to us other products and services that benefit us but may not benefit your accounts. We also receive certain additional economic benefits from the custodian that may or may not be offered to any other independent investment Advisors participating in the program. Some of these other products and services assist us in managing and administering your accounts. These include software and technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of our fees from your account, and assist with back-office functions, recordkeeping, and reporting.

Many of these services generally may be used to service all or a substantial number of our accounts. The custodians also make available to us other services intended to help us manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, the custodians may make available, arrange and/or pay for these services rendered to us by

third parties. The custodians may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us.

While as a fiduciary, we endeavor to act in your best interest, our recommendation that you maintain your assets in accounts at our recommended custodians may be based in part on the benefit to us or the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the custodian, which may create a conflict of interest. IARs endeavor at all times to put the interest of our clients first as a part of their fiduciary duty.

As a matter of policy and practice, we do not utilize research, research-related products and other services obtained from broker-dealers, or third parties, on a soft dollar commission basis other than what is described above.

Trade Errors

Financial Abundance and Sub-Advisor have implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with our fiduciary duty, it is our policy to correct trade errors with the Sub-Advisor in a manner that is in the best interest of the client. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client will be made whole, and we will absorb any loss resulting from the trade error if the error was caused by the firm. If the error is caused by the broker-dealer, the broker-dealer will be responsible for covering all trade error costs. If an investment gain results from the correcting trade, the gain will be donated to charity. We will never benefit or profit from trade errors.

Item 13 – Review of Accounts

Reviews are offered annually to all financial planning Clients under retainer. More frequent reviews may be initiated by Client request, changes in tax laws, changes in Client's situation, or other event relevant to Client's financial planning needs. Reviews assess diversification, investment performance, whether accounts are in keeping with Client's investment plan, as well as address applicable tax, insurance, and estate planning issues. Reviews are only conducted by Investment Advisor Representatives of FAI which are currently Rubin Nichols, Debra Seaward, and Ashton Immel.

Matson Money's Review

Because performance of the underlying instruments in each account is not uniform, over time, the actual allocation in each account will begin to drift, or deviate, from the original asset allocation targets we set. Accounts are rebalanced by reallocating assets to original asset targets. Accounts are re-optimized when we set new target asset category percentages.

Matson monitors Client accounts on an on-going basis and rebalances or reallocates assets as warranted. Changes in the portfolio, which include adding, removing, or replacing securities at our discretion, are made infrequently based on significant changes in academic research and data; quantitative analytics; the tax code; the management of the securities used by the portfolio; and/or the client's personal circumstances, including health, employment, marital and family status. We may replace a particular security if it significantly diverges from its relevant index in terms of risk or return with a security that is more in line with the risk/return profile of the relevant index.

Matson provides Clients with written reports on a quarterly basis. Copies of these reports are also posted

on their internal website and are made available to clients and co-advisors. Quarterly reports show shares currently owned by Clients and their current asset mix. They may also request a report showing the quarterly and annual rate of return for your account(s). Clients are expected to address questions or concerns to their co-advisors. Our fee is reported on your custodian's quarterly custody statements (see Item 15, below) and our quarterly reports.

Continuing Client Education

Private Investor Education Sessions are an opportunity to meet with the clients of Financial Abundance on a regular basis (in April, July, and November). All clients receive a mailed invitation as well as several email messages announcing each session encouraging them to attend. We review topic-specific investing subjects, simplifying the works of many notable educators and Nobel Laureates through the financial science and academic research of the last 50 years. The primary focus is to reinforce our investment philosophy.

Item 14 – Client Referrals and Other Compensation

Financial Abundance does not receive any economic benefits (e.g., sales incentives, prizes) from non-clients for providing investment advice. Financial Abundance does not compensate any person for client referrals.

Item 15 – Custody

Financial Abundance will not have physical custody of any assets in a client's account. Custody of client assets will be maintained with the independent custodian selected by the client. Financial Abundance is a co-advisor of Matson Money. Matson Money provides disclosure, fee, and billing directly with the custodian. Clients will receive a statement, at least quarterly, directly from the custodian showing all holdings and all transactions occurring in the client's account during the period covered by the account statement. Clients are urged to carefully review the account statement sent by the custodian for accuracy. Financial Abundance uses Pershing, Charles Schwab institutional platform or TIAA-CREF as custodian for all of Clients various brokerage accounts.

Item 16 – Investment Discretion

Financial Abundance has investment discretion to make any changes or alterations to a client's account. In a Sub-Advisor relationship, Financial Abundance will only make changes to a client's account after receiving the express consent of the client. Upon receiving consent to make changes or alterations, Financial Abundance will provide written instructions to the Sub-Advisor to make those changes.

In a Co-Advisor relationship, Matson Money is the discretionary adviser to your account. They are granted discretionary authority to invest Client assets in the Funds based on Client responses to the questionnaire and to use temporary cash sweep vehicles as appropriate. The co-advisers, Financial Abundance, serves as non-discretionary advisers to the clients will only make changes to a client's account after receiving the express consent of the client.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Financial Abundance does not accept any authority to and does not vote proxies on behalf of advisory clients. Additionally, we do not provide advice to clients on how the client should vote proxies.

Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. If any proxy materials are received by Financial Abundance 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.

Item 18 – Financial Information

Under no circumstances will Financial Abundance solicit or require prepayment six months or more in advance from any Client for advisory services.

Financial Abundance does not have discretionary authority or custody over Client funds or securities.

We have no financial commitments that would impair our ability to meet contractual and fiduciary commitments to clients. Neither Financial Abundance, nor any of the principals, have been the subject of a bankruptcy petition at any time in the past.