

Firm Brochure
(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of Meridian Financial, LLC. If you have any questions about the contents of this brochure, please contact us at: (508) 429-2600, or by email at: meridianfinancial@verizon.net. 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 Meridian Financial is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

Since our last annual updating amendment, dated April 5, 2022, we have made the following material changes to our Form ADV:

- We are no longer offering the Subscription Service and our disclosure brochure has been updated to remove any references to that service in Item 5.
- The initial fees that were provided for our financial planning services have changed since these services were first introduced. Please refer to Item 5 of this disclosure for our current fees.
- We are adjusting how we provide advice on workplace retirement plans. Rather than the client having to provide statements and make the allocation changes themselves Meridian Financial will be managing the workplace retirement plan for clients through the services of Pontera. Please refer to Item 4 and Item 5 of this brochure for additional information.
- We use the custodial services of Charles Schwab & Co., Inc. For more information regarding our relationship with Charles Schwab, please refer to Item 12.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 508 429-2600 or by email at: meridianfinancial@verizon.net.

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Item 4 Advisory Business

Firm Description

Meridian Financial, LLC, ("Meridian Financial") was founded in 1990.

Meridian Financial provides personalized confidential financial planning and investment management to individuals, couples, families and trusts. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Meridian Financial is strictly a fee-only financial planning and investment management firm. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted.

Investment advice is an integral part of financial planning. In addition, Meridian Financial advises clients regarding cash flow, education planning, retirement planning, tax planning and estate planning. Investment advice is provided, with Meridian Financial, LLC making the final decision on investment selection. Part of the comprehensive planning is determining the appropriate asset allocation for the client that will provide them with the highest probability of reaching their goals. Meridian Financial does not act as a custodian of client assets. The client always maintains asset control. Meridian Financial places trades for clients under a limited power of attorney.

Written evaluations are provided to the client as each planning topic is addressed. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Meridian Financial coordinates with these other advisors to facilitate plan implementation. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

Principal Owners

Georgia Bruggeman.

Types of Advisory Services

Meridian Financial provides investment supervisory services, also known as asset management services; furnishes investment advice through consultations.

On more than an occasional basis, Meridian Financial Advisors furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

Tailored Relationships

All financial plans are tailored to address each individual client's needs and situation. The investment advisory part of the business also provides a specialized investment mix based on the client's time frame, risk tolerance and objectives. We employ a long term investment strategy based on fundamental analysis and asset allocation. While we generally invest from the entire universe of

stocks, bonds, mutual funds and ETFs, clients who wish to pursue a more specialized approach, such as socially responsible investing, are permitted to restrict their investments to include only those which fall into said category. Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Financial Planning Agreement

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are not provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

Advisory Service Agreement

Most clients choose to have Meridian Financial manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed, including those of their children. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. An Advisory Service Agreement includes: cash flow management; insurance needs analysis; investment management (including performance reporting); education planning; retirement planning with workplace retirement plan management; estate planning; as well as the implementation of recommendations within each area. Detailed investment advice and specific recommendations are provided as part of Advisory Services.

Investment Management Agreement

An *Investment Management Agreement* may be executed when financial planning is not provided as part of the relationship. The annual fees for an *Investment Management Agreement* are listed in the *Fees and Compensation* section below.

Asset Management

Assets are invested primarily in no-load and exchange-traded funds, usually through discount brokers. Management of workplace retirement plans will be limited to the security choices available in the plan. Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through Meridian Financial Advisors.

Held Away Assets

We use a platform provided by Pontera ("Pontera") to manage held away assets such as defined contribution plan participant accounts, with discretion. The platform allows us to avoid being considered to have custody of Client funds since we do not have direct access to Client log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform. Once Client account(s) is connected to the platform, Adviser will review the current account allocations. When deemed necessary, Adviser will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least quarterly and allocation changes will be made as deemed necessary.

Assets Under Management

As of February 21, 2023, we provide continuous management services for \$193,113,688 in client assets on a discretionary basis.

Item 5 Fees and Compensation

Description

Meridian Financial is a fee-only financial advisory firm. We charge a flat fee to produce financial plans, a percentage of assets for portfolio management and hourly consultations where appropriate. All investment advisory fees are also non-negotiable. Meridian Financial, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Advisory Services

Investment Portfolio	Quarterly Assets Under Management Fee
\$500,000 - \$1,000,000	25.00 basis points (1.00% per year)
\$1,000,001 - \$3,000,000	21.25 basis points (.85% per year)
\$3,000,001 - \$5,000,000	16.25 basis points (.65% per year)
Amounts over \$5,000,001	12.50 basis points (.50% per year)

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Financial Planning

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The fee range is \$3500 to \$10,000 and is not negotiable. For new clients with \$500,000 in assets under our management the financial planning fee is \$3500. Those who would like a financial plan only with no ongoing work the financial planning fee range is \$5000 to \$10,000. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan for plan only clients, future face-to-face meetings may be scheduled as necessary for up to one month. Follow-on implementation work is billed separately at the rate of \$350 per hour.

For Ongoing Advisory clients where we are managing assets comprehensive financial planning is included in the asset management fee following the initial plan delivery.

Hourly Planning Engagements

Meridian Financial provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$350.

Fee Billing

Our financial planning service is provided for a nonnegotiable flat fee contingent upon the complexity of the plan. Clients are billed directly for financial planning services with an upfront fee of one half of the total balance due at the beginning of the process and the remainder due at the time of plan delivery. Hourly clients are billed at the time of service.

For client assets custodied at TD Ameritrade the investment advisory business charges clients quarterly on a forward basis based on a percentage of the client's assets under management at the end of the previous quarter (See Fee Schedule). These fees are automatically deducted from the clients' accounts under management. To avoid any conflict of interest, we do not represent any outside interests and are not compensated for the sale of any product.

For workplace retirement plans the management fee will be deducted from an account custodied at TD Ameritrade. This fee will be billed separately and reported on a separate line on your TD Ameritrade statement. The Firm is also a fiduciary under the Internal Revenue Code (the "IRC") with respect to investment management services and investment advice provided to ERISA plans, ERISA plan participants, IRAs and IRA owners (collectively, "Retirement Account Clients"). As such, The Firm is subject to specific duties and obligations under ERISA and the IRC that include, among other things, prohibited transaction rules which are intended prohibit fiduciaries from acting on conflicts of interest. When a fiduciary gives advice in which it has a conflict of interest, the fiduciary must either avoid or eliminate the conflict or rely upon a prohibited transaction exemption (a "PTE"). An example of a conflict, is when the Firm recommends for a client to rollover their ERISA plan retirement assets to a Firm managed Individual Retirement Account (IRA), and as a result the Firm earns a higher management fee. The Firm mitigates this conflict by relying on the Department of Labor's Investment Advice PTE. The Firm complies with ERISA's impartial conduct standards by only recommending a retirement plan rollover when it is in the best interest of the client.

The client advice we provide, as well as the selection of investment options, is based solely on the suitability of these products in relation to the client's needs. We never receive a commission or compensation of any kind for any of the products we recommend.

IRA Rollover Recommendations

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. As fiduciaries, we are required to act in your best interest and not put our interest ahead of yours. We must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest. Rolling your assets over to us allows us to provide comprehensive advice on your total situation including withdrawal strategies, tax minimization strategies, estate planning and charitable giving. We do not provide advice or guidance on held away assets that are able to be custodied at TD Ameritrade or Charles Schwab.

Held Away Assets

For assets held at a custodian that is not directly accessible by our firm ("Held Away Accounts"), we may, but are not required to, manage these Held Away Accounts using the Pontera Order Management System ("Pontera") that allows our firm to view and manage assets. Our annual fee for investment management services for held away accounts will follow our portfolio management fee schedule and termination instructions as noted above.

Our advisory fees will not be deducted directly from the accounts managed through the Pontera Order Management System. We will send you an invoice showing the amount of the fee, the value of the assets on which the fee is based, the time period covered by the fee, and the specific manner in which the fee was calculated for held away accounts managed through the Pontera Order Management System. Clients will have the option of paying the invoice by giving written authorization to deduct the fee from a brokerage account managed by our firm, in which case, the advisory fee would be deducted from the brokerage account each quarter, or the client may pay the invoice with a bank account or credit card. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements and invoices for accuracy.

You will not pay our firm a higher advisory fee other than what is listed above due to the use of Pontera. We pay 0.25% from our advisory fee to Pontera.

Other Fees Clients May Pay

Custodians may charge transaction fees on purchases or sales of certain mutual funds and individual bonds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds. Meridian Financial does not receive any compensation, in any form, from fund companies.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades.

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to Meridian Financial.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Past Due Accounts and Termination of Agreement

Meridian Financial reserves the right to stop work on any account that is more than 60 days overdue. In addition, Meridian Financial reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Meridian Financial judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days. A Client may terminate any of the aforementioned agreements at any time by notifying Meridian Financial in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, Meridian Financial will refund any unearned portion of the advance payment.

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

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Meridian Financial does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7 Types of Clients

Description

Meridian Financial generally provides investment advice to individuals, families and small businesses.

Client relationships vary in scope and length of service.

Account Minimums

Meridian Financial generally require investable assets of \$500,000 although we evaluate each situation individually.

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

Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, and cyclical analysis.

Individual security analysis is performed largely through the use of valuation models, employing techniques from modern portfolio theory, statistics, fundamental and quantitative analyses, Dupont model, ratio analyses, earnings models, discounted cash flow, price to dividend, sales and book value.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that Meridian Financial may use include Morningstar Office, Value Line Investment Survey, S&P, Moody's, and the World Wide Web.

Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation utilizing a core and satellite approach. This means that we use passively-managed index and exchange-traded funds as the core investments, and then add actively-managed funds, as well as individual securities and bonds where there are greater opportunities to make a difference. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

While strategy mainly employs long-term purchases some short-term purchases are utilized to take advantage of temporary market inefficiencies.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Item 9 Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10 Other Financial Industry Activities and Affiliations

Financial Industry Activities

Meridian Financial is not registered as a securities broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor.

Affiliations

Meridian Financial does not have a relationship or an arrangement that is material to its advisory or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

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

Code of Ethics

The employees of Meridian Financial have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

We do, on occasion, buy the same securities that we recommend and purchase for our clients. Such purchases are immaterial to the total daily volume of the equity or the total assets of the mutual fund and therefore do not represent a conflict of interest.

Personal Trading

Since most employee trades are small mutual fund trades, exchange-traded fund trades, or securities trades, the trades do not affect the securities markets. Meridian Financial, LLC does review employee positions and trading activity on a quarterly basis.

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Aggregated Trading

Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. We may also combine our orders to purchase securities with your orders to purchase securities ("aggregated trading"). Refer to the *Brokerage Practices* section in this brochure for information on our aggregated trading practices.

A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

Selecting Brokerage Firms

Meridian Financial does not have any affiliation with product sales firms. All client securities are custodied with TD Ameritrade and Charles Schwab & Co., Ltd. ("Charles Schwab"). Meridian Financial uses TD Ameritrade and Charles Schwab due to its range of services, low fee investment options and their support of the independent, fee only advisor model. Clients are not able to direct trading to other brokers outside of TD Ameritrade and Charles Schwab.

Meridian Financial does not receive fees or commissions from any of these arrangements.

Soft Dollars

Meridian Financial uses the available products and services, as well as, complimentary research provided by TD Ameritrade and Charles Schwab. 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.

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 are in addition to any benefits or research we pay for with soft dollars, and 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.

The custodian and brokers we use

We do not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian.

We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when you instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. Conflicts of interest associated with this arrangement are described below as well as in Item 14 (Client referrals and other compensation). You should consider these conflicts of interest when selecting your custodian.

We do not open the account for you, although we may assist you in doing so.

How we select brokers/custodians

We recommend Schwab, a custodian/broker that will hold your assets and execute transactions. When considering whether the terms that Schwab provides are, overall, most advantageous to you when compared with other available providers and their services, we take into account a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Services delivered or paid for by Schwab
- Availability of other products and services that benefit us, as discussed below (see "Products and services available to us from Schwab")

Your brokerage and custody costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs and equities) do not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers.

Although we are not required to execute all trades through Schwab, we have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How we select brokers/custodians"). By using another broker or dealer you may pay lower transaction costs.

Products and services available to us from Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us.

Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Schwab's support services:

Services that benefit you. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets.

The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that do not directly benefit you. Schwab also makes available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts and operating our firm. They include investment research, both Schwab's own and that of third parties. We use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services that generally benefit only us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology and business needs
- Consulting on legal and related compliance needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Schwab provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. Schwab also provides us with other benefits, such as occasional business entertainment of our personnel. If you did not maintain your account with Schwab, we would be required to pay for these services from our own resources.

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The fact that we receive these benefits from Schwab is an incentive for us to recommend the use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate, our recommendation of Schwab as

custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How we select brokers/ custodians") and not Schwab's services that benefit only us.

Best Execution

TD Ameritrade/Schwab uses advanced routing technology and constantly evaluates execution quality. The vast majority of market orders executed receive a price better than the nationally published quote. 96.5% Executed market orders receiving price(s) better than the National Best Bid/Offer (NBBO) at the time of routing, divided by the total number of orders executed. TD Ameritrade's proprietary routing technology enables market orders to be filled quickly. *0.05 seconds*.

Order Aggregation

Mutual funds are not aggregated because all purchases or sales on a specific day will be executed at the same price at the end of the day. Exchange-traded funds, individual securities and individual bonds are aggregated whenever possible to provide the best execution for all clients.

Mutual Fund Share Classes

Mutual funds are sold with different share classes, which carry different cost structures. Each available share class is described in the mutual fund's prospectus. When we purchase, or recommend the purchase of, mutual funds for a client, we select the share class that is deemed to be in the client's best interest, taking into consideration the availability of advisory, institutional or retirement plan share classes, initial and ongoing share class costs, transaction costs (if any), tax implications, cost basis and other factors. We also review the mutual funds held in accounts that come under our management to determine whether a more beneficial share class is available, considering cost, tax implications, and the impact of contingent or deferred sales charges. We do not buy any mutual funds that have a sales charge, or load.

Item 13 Review of Accounts

Periodic Reviews

Meridian Financial reviews client accounts and financial plans regularly. Client accounts are reviewed on an ongoing basis with quarterly reports provided to clients. Meridian Financial's president, Georgia Bruggeman conducts these reviews with Lead Advisor, Rana Chouba.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, increased volatility and changes in a client's own situation.

Regular Reports

Meridian Financial provides written reports quarterly to our clients. These reports contain information regarding performance, holdings, asset allocation and income generation.

Item 14 Client Referrals and Other Compensation

Charles Schwab & Co., Inc - Institutional

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. You do not pay more for assets maintained at Schwab as a result of these arrangements. However, we benefit from the referral arrangement because the cost of these services would otherwise be borne directly by us.

Incoming Referrals

Meridian Financial has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

Meridian Financial does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

Meridian Financial does not receive any sales awards or prizes for providing investment advice.

Refer to the *Brokerage Practices* section above for disclosures on research and other benefits we may receive resulting from our relationship with your account custodian.

Item 15 Custody

Account Statements

For accounts custodied at TD Ameritrade and Charles Schwab, TD Ameritrade and Charles Schwab provide monthly paper account statements directly to clients at their address of record or electronic statements sent to the client's email. For Workplace retirement plans the custodian will provide statements either electronically or paper at the address of record for the participant.

Your independent custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/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 at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

Performance Reports

Clients are urged to compare the account statements received directly from TD Ameritrade to the performance and holdings report statements provided by Meridian Financial.

Item 16 Investment Discretion

Discretionary Authority for Trading; Assets Custodied at TD Ameritrade

Meridian Financial accepts discretionary authority to manage securities accounts on behalf of clients. Meridian Financial has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client approves the custodian to be used and the commission rates paid to the custodian. Meridian Financial does not receive any portion of the transaction fees or commissions paid by the client to the custodian on any trades.

Discretionary trading authority facilitates placing trades in your accounts on the clients behalf so that we may promptly implement the agreed upon asset allocation.

Discretionary Authority for Trading; Workplace Retirement Plans

Meridian Financial accepts discretionary authority to manage workplace retirement accounts on behalf of clients. Meridian Financial has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Securities available to be purchased in workplace retirement plans is limited by the lineup of choices available in the plan.

Discretionary trading authority facilitates placing trades in your accounts on the clients behalf so that we may promptly implement the agreed upon asset allocation

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. Clients sign a limited power of attorney so that we may execute the trades on their behalf.

Item 17 Voting Client Securities

Proxy Votes

Meridian Financial does not vote proxies on securities. Clients receive proxies directly from the custodian and are expected to vote their own proxies.

When assistance on voting proxies is requested, Meridian Financial will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Item 18 Financial Information

Financial Condition

Meridian Financial does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Meridian Financial does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1200 per client, and six months or more in advance.

We have not filed a bankruptcy petition at any time in the past ten years.

Item 19 Requirements for State-Registered Advisers

We are a federally registered investment adviser; therefore, we are not required to respond to this item.

Item 20 Additional Information

Privacy Notice

Meridian Financial is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.