# Form ADV Part 2A

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This brochure provides information about the qualifications and business practices of Financial Life Planners, LLC. If you have any questions about the contents of this brochure, please contact our firm at 480-477-8530. 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. Registration as an investment adviser, either with the SEC or with a state securities authority does not imply a certain level of skill or training.

Additional information about Financial Life Planners, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Financial Life Planners, LLC's CRD number is 129415.

## Item 2 – Material Changes

Set forth below is a summary of material changes in this Brochure from our last annual update. Our last annual update was dated April 9, 2024. Since that date, there have been the following material changes to Financial Life Planners, LLC's advisory business:

- Our firm has moved its primary office to a new location, which is reflected on Item 1 Cover Page of this Firm Brochure.
- Item 4 has been amended to reflect our AUM as of 12/31/2024.
- Our designated Chief Compliance Officer is Michele Dallmann.

We encourage you to read this Brochure in its entirety.

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## Item 4 – Advisory Business

Financial Life Planners, LLC ("Financial Life Planners", "FLP", "the Firm", "our", or "we") is an SEC-registered investment adviser. Financial Life Planners is an independent investment management firm that provides investment advice, portfolio management services and financial planning services. We were founded in 2004 by Cynthia K. Fick, as a sole proprietor LLC, who has provided investment advice and portfolio management services since 1987. Gina Giachetti Wight joined the firm in March of 2020 as an Investment Advisor Representative (IAR). Cynthia K. Fick is the Manager of Financial Life Planners, LLC, and owns 66%. Gina Giachetti Wight is a Member of Financial Life Planners, LLC, and owns 34%.

FLP offers the following investment advisory services:

### *Investment Management Services*

Financial Life Planners provides investment advice and portfolio management services on a continuing basis, which includes appropriate allocation of managed assets among cash, money market funds, CD's, bonds, stocks, municipal and government securities, exchange-traded funds, mutual funds, unit investment trusts, annuities, and other appropriate investments with the selection of specific securities which will provide proper diversification and help meet the client's stated investment objectives. On rare occasions, FLP may use options to hedge a portfolio for those clients who have an appropriate risk tolerance.

At the establishment of the advisory relationship, we collaborate with new clients on the preparation of client-specific portfolio recommendations, which includes the client's personal financial situation, long-term return objectives, risk-tolerance, and any special constraints on the portfolio, such as significant tax exposure, a need for liquidity, or a desire for socially responsible screening. We also describe our investment approach and decide on an allocation of assets among cash, money market funds, CD's, bonds, stocks, municipal and government securities, exchange-traded funds, mutual funds, unit investment trusts, annuities, and other appropriate investments. We primarily utilize mutual funds, exchange-traded funds, and individual stocks and bonds.

### *Financial Planning Services*

In addition to investment management services, Financial Life Planners provides financial planning services to clients, which may include goal-based planning, cash-flow management, and general advice regarding mortgages, insurance, estate planning, tax planning, etc.

Financial planning services are typically offered to investment management clients at no additional charge. Financial Life Planners may occasionally offer stand-alone financial planning services charged at an hourly rate or a one-time fee.

Financial Life Planners does not provide tax, real estate, or legal services or advice.

We tailor individual client portfolios in the following ways:

- We review a client's personal risk tolerance and time horizon and then provide an asset allocation designed to optimize the trade-off between risk and return.

- We review a client's liquidity needs to make sure they have sufficient cash on hand to fund either regular or unexpected portfolio withdrawals.
- We gather information about each client's tax situation to make sure that we are achieving the best possible investment returns on an after-tax basis.
- We make accommodations for investments that a client may hold that is outside of our normal set of recommendations.
- We allow for clients to impose restrictions on investing in certain securities or types of securities.

### *Use of Third-Party Managers or Sub-Advisors*

In some situations, we offer the use of Third-Party Managers or Sub-Advisors ("Outside Managers") for portfolio management services. We assist clients in selecting an appropriate allocation model, completing the Outside Manager's investor profile questionnaire, interacting with the Outside Manager and reviewing the Outside Manager. Additionally, we will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

Financial Life Planners uses the Pontera platform made available by Pontera Solutions, Inc. ("Pontera"), a third-party online platform, to assist with management of clients' "held away" accounts, including 401(k)s, 403(b)s, annuities, and 529 education savings plans, and as an order management system for such accounts where Financial Life Planners implements tax-efficient asset allocation and opportunistic rebalancing strategies on behalf of the client.

Financial Life Planners uses the ShareBuilder 401k platform made available by ShareBuilder Advisors, LLC ("ShareBuilder"), a third-party online platform, to assist with management of clients' 401(k) assets. ShareBuilder serves as an ERISA 3(38) Investment Advisor and provides investment advice, consulting services and information to plan sponsors regarding establishing defined contribution plans for their employees. ShareBuilder does not have discretionary authority over plan participant accounts and does not otherwise implement investment choices.

### *Wrap Fee Program*

Financial Life Planners does not participate in or sponsor wrap-fee programs.

### *Assets Under Management*

Financial Life Planners manages client accounts on a discretionary basis, which means that clients do not approve transactions prior to their execution. As of December 31, 2024, we had approximately $174,578,704.20 in discretionary assets under management and $0 in non-discretionary assets under management.

We have disclosed all material conflicts of interest relating to us or our representatives and employees that could be reasonably expected to impair the rendering of unbiased or objective advice. Conflicts of interest may include but are not limited to compensation arrangements connected with advisory services which are in addition to the advisory fees, other financial industry activities or affiliations, or participation of interest in client transactions.

## Item 5 – Fees and Compensation

The specific way in which fees are charged by Financial Life Planners are established in a client's written advisory agreement. Our fees are calculated by taking the market value of your portfolio or account holdings on the final trading day of each quarter and, using the following rate schedule, and dividing by four to arrive at a quarterly fee amount. Our annualized fee schedule is:

| ASSETS UNDER MANAGEMENT | MANAGEMENT FEE |
|---|---|
| **FIRST $99,999.99** | 1.5% |
| **$100,000 – $249,999.99** | 1.3% |
| **$250,000 – $499,999.99** | 1.2% |
| **$500,000 - $1,999,999.99** | 1% |
| **$2,000,000 +** | .75% |

The above is our current fee schedule. Current or previous clients of FLP may have fee schedules that differ from the above. Fees are negotiable. Lower fees for comparable services may be available from other sources. Advisory fees include the provision of financial planning services at no additional charge. Outside Managers shall be paid a fee, separate and distinct from that payable to Financial Life Planners.

Financial Life Planners includes the costs of the Pontera platform in its overall advisory fee for each managed account. Clients do not pay any additional fee to Pontera or to Financial Life Planners in connection with platform participation. Financial Life Planners is not affiliated with the Pontera platform in any way and receives no compensation from them for using their platform.

Investment management fees for Pontera accounts are generally directly debited on a pro rata basis from client accounts. The exception for this is directly managed held away accounts, such as 401(k)s. As it is impossible to directly debit the fees from these accounts, those fees will be assigned to the client's taxable accounts on a pro-rata basis. If the client does not have a taxable account, fees will be billed directly to the client from a non-retirement account.

Clients pay an asset-based fee to ShareBuilder in connection with platform participation which is debited from their accounts by ShareBuilder's administrator. Financial Life Planners receives 50 basis points of the fees charged by Sharbuilder in connection with platform participation. Financial Life Planners is not affiliated with the ShareBuilder platform in any way and receives no additional compensation from them for using their platform.

Financial Life Planners may occasionally, at its discretion, provide stand-alone financial planning services to individuals who do not retain our investment management services. These financial planning services will be charged a fee for service at an hourly rate of $250 or a one-time fee that ranges between $1,000 and $2,500. Fees for financial planning are billed in arrears.

Investment management fees for accounts at Fidelity and Schwab may be billed in advance or in arrears depending on the client's advisory agreement. Our clients authorize the account custodian to debit our investment advisory fee from their account. Each quarter, we will notify your custodian of the amount of the fee due and payable to us through our fee schedule and contract. The custodian does not validate or check our fee, its calculation, or the assets on which the fee is based. They will withdraw the fee from your account(s) or, if you have more than one account, from the account you have designated to pay our advisory fees. In some situations, we may agree to invoice a client for their quarterly fee.

Each quarter you will receive a statement directly from your custodian showing all transactions, positions, and credits/debits into or from your account, including the advisory fee paid by you to us.

The fees listed above are in addition to any fees charged by the account custodian or costs associated with the implementation of the investment plan. These costs may include brokerage commissions, transaction fees, mutual fund operating expenses, custodial fees, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Financial Life Planners does not receive any portion of these commissions, fees, or costs, and seeks to minimize them on clients' behalf whenever possible.

Item 12 further describes the factors that Financial Life Planners consider in selecting or recommending broker dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

Investment Advisory contracts may be terminated at any time for any reason with written notice at the will of the client or Financial Life Planners. Financial Life Planners will refund any prepaid, unearned fees, and any earned but unpaid fees will be promptly due and payable.

Financial Life Planners and its Supervised Persons do not receive compensation from the sale of mutual funds or other securities. Please see Item 10 for information concerning insurance.

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

Financial Life Planners does not charge any performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a client.

## Item 7 – Types of Clients

Financial Life Planners provides investment management and financial planning services to:

- Individuals, including high net worth individuals.
- Families, trusts, and estates.
- Corporations and other business entities.
- Qualified and 401k plans.

Financial Life Planners does not have a mandatory minimum account size but usually onboards accounts with a minimum of $500,000. For smaller accounts, FLP will use its sole discretion in determining if the accounts will be suitable for our practice.

FLP expects their clients to be forthright, communicative and to participate in the investment and portfolio management process.

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

***Methods of Analysis****:* Financial Life Planners follows the principles of fundamental and technical analysis methods, as well as asset allocation to construct broadly diversified investment portfolios that are designed for the long-term and are based on each client's personal circumstances (goals, time horizon, risk tolerance, tax considerations). We strive to keep expenses and investment costs low, and primarily use no-load, low-cost mutual funds and exchange-traded funds when implementing investment portfolios. We seek to minimize the effect of taxes through asset location and tax-efficient investment vehicles.

The following is a description of how the firm combines fundamental and technical security analysis methods based on the methods espoused in Investor Business Daily, a daily newspaper publication. FLP analyzes the markets and individual securities based on the fundamental analysis aspects of earnings growth, new products, supply and demand, leadership, and institutional ownership. Then FLP combines technical analysis which concentrates on historical trends and their relationships among and between various quantitative measures. These variables are typically displayed in charts and graphs and studied to determine if a particular pattern is repeating, ongoing or non-existent. Examples of technical analysis factors include, but are not limited to, market trading volume, price levels, and price movements.

***Investment Strategies*****:** FLP employs an investment philosophy emphasizing portfolio management that is custom tailored to the needs of each client. We do not only use a buy and hold strategy but employ a more tactical, monitored approach to investment management. We begin the investment process by carefully listening to the client and gaining a thorough understanding of the client's unique goals, risk tolerance, time horizon, and other circumstances. We then determine an appropriate investment strategy for the client based on that understanding.

***Risk of Loss:*** Although we do a great amount of work to determine in advance a client's risk tolerance, it is important to understand that investing money involves many risks, including the risk of loss of principal, and clients should be prepared to bear this risk. We cannot guarantee any particular investment outcome. Investing in securities involves the risk of loss that clients should be prepared to bear. Security markets are volatile and can decline significantly in response to adverse issues, political, regulatory, market, or economic developments. When securities are sold, they may be worth more or less than what they were purchased for, which means that you could lose money.

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 the security's 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.

***Credit Risk*** - Credit risk typically applies to debt investments such as corporate, municipal, and sovereign fixed income or bonds. A bond issuing entity can experience a credit event that could impair or erase the value of an issuer's securities held by a client.

***Legislative and Tax Risk*** – Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations, particularly for options, swaps, master limited partnerships, Real Estate Investment Trust, Exchange Traded

Products/Funds/Securities. We do not engage in tax planning, and in certain circumstances a Client may incur taxable income on their investments without a cash distribution to pay the tax due. Clients and their personal tax advisors are responsible for how the transactions in their account are reported to the IRS or any other taxing authority.

Mutual Fund Securities

Investing in mutual funds carries inherent risk. The major risks of investing in a mutual fund include the quality and experience of the portfolio management team and its ability to create fund value by investing in securities that have positive growth, the amount of individual company diversification, the type and amount of industry diversification, and the type and amount of sector diversification within specific industries. In addition, mutual funds tend to be tax inefficient and therefore investors may pay capital gains taxes on fund investments while not having yet sold the fund.

Exchange-Traded Funds ("ETFs")

ETFs are investment companies whose shares are bought and sold on a securities exchange. An ETF holds a portfolio of securities designed to track a specific market segment or index. The funds could purchase an ETF to gain exposure to a portion of the U.S. or foreign market. The funds, as a shareholder of another investment company, will bear their pro-rata portion of the other investment company's advisory fee and other expenses, in addition to their own expenses. Investing in ETFs involves risk. Specifically, ETFs, depending on the underlying portfolio and its size, can have wide price (bid and ask) spreads, thus diluting or negating any upward price movement of the ETF or enhancing any downward price movement. Also, ETFs require more frequent portfolio reporting by regulators and are thereby more susceptible to actions by hedge funds that could have a negative impact on the price of the ETF. Certain ETFs may employ leverage, which creates additional volatility and price risk depending on the amount of leverage utilized, the collateral and the liquidity of the supporting collateral. Further, the use of leverage (i.e., employ the use of margin) generally results in additional interest costs to the ETF. Certain ETFs are highly leveraged and therefore have additional volatility and liquidity risk. Volatility and liquidity can severely and negatively impact on the price of the ETF's underlying portfolio securities, thereby causing significant price fluctuations of the ETF.

Equity Securities

Investing in individual companies involves inherent risk. The major risks relate to the company's capitalization, quality of the company's management, quality and cost of the company's services, the company's ability to manage costs, efficiencies in the manufacturing or service delivery process, management of litigation risk, and the company's ability to create shareholder value (i.e., increase the value of the company's stock price). Foreign securities, in addition to the general risks of equity securities, have geopolitical risk, financial transparency risk, currency risk, regulatory risk and liquidity risk.

Fixed Income Securities

Fixed income securities carry additional risks than those of equity securities described above. These risks include the company's ability to retire its debt at maturity, the current interest rate environment, the coupon interest rate promised to bondholders, legal constraints, jurisdictional risk (U.S or foreign) and currency risk. If bonds have maturities of 10 years or greater, they will likely have greater price swings when interest rates move up or down. The shorter the maturity the less volatile the price swings. Foreign bonds have liquidity and currency risk.

Private Investments

Private investments carry additional risks than those of equity securities described above. Investors should carefully review the relevant private placement memorandum, prospectus, or their own investment guidelines for additional risks specific to their particular investments.

Municipal Bonds

Municipal Bonds are debt instruments issued by states, cities, and other local government entities to fund day-to-day obligations and to finance capital projects such as building schools, parks or local highways. There are two types of Municipal Bonds: General Obligation and Revenue Bonds. They carry additional risks than those described above. Investors should carefully read the official statement describing General Obligation and Revenue Bonds before making an investment decision.

## Item 9 – Disciplinary Information

Neither the firm nor any management person have been subject to any criminal or civil actions, administrative proceedings, or self-regulatory proceedings.

## Item 10 – Other Financial Industry Activities and Affiliations

Neither the firm or any management person is registered, or has an application pending to register, as a broker-dealer, a registered representative of a broker-dealer, a futures commission merchant, a commodity pool operator, a commodity trading advisor, or as an associated person of any of the foregoing entities.

Financial Life Planners has no material relationship or arrangement with any of the following: broker-dealers, municipal or government securities dealers, investment companies or other pooled investments, closed-end investment companies or unit investment trusts, hedge funds or offshore funds, other investment advisors or financial planners, futures commission merchants, commodity trading advisors, banking or thrift institutions, accountancy firms or law firms.

Financial Life Planners is an insurance agency and uses the DBA FLP Insurance Services. Cynthia Fick, Gina Wight, Kelsey White, and Matt Fick are licensed insurance agents. They may recommend insurance products and may also, as independent insurance agents, sell those recommended insurance products to clients. When such recommendations or sales are made, they earn insurance commissions for the sale of those products. FLP requires that all insurance producers disclose this when such recommendations are made. Clients are under no obligation to purchase insurance products through our associates.

Cynthia Fick is the owner of FLP Insurance Services, LLC, a separate entity, but it is not an insurance agency nor is it engaged in any business.

Financial Life Planners acquired the accounts of Smarter Divorce Solutions, LLC, a separate entity, in 2022 and the owner Nancy Hetrick receives a contractual loan amount and referral fees as compensation.

We do not recommend or select other investment advisers for our clients and do not receive any compensation from any investment adviser.

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

Financial Life Planners has adopted a Code of Ethics for the firm describing our high standard of business conduct and fiduciary duty to our clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All Supervised Persons at Financial Life Planners must acknowledge the terms of the Code of Ethics annually, or as amended.

The owners and advisors of Financial Life Planners follow the same investment strategy for their personal assets as is recommended to clients and, as a result, have ownership interest in many of the same investments. Employee trading is continually monitored to reasonably prevent conflicts of interest between Financial Life Planners and its clients by, when feasible, affecting the timing of trades so that clients are not disadvantaged.

Neither the firm nor any related person recommends to clients, or buys or sells for client accounts, securities in which we or a related person have a material financial interest.

Additionally, because we may provide investment advice pertaining to employee benefit plans, such as 401Ks, and individual retirement plans (IRAs), we must acknowledge our fiduciary status in writing under Title I of ERISA and the Internal Revenue Code, as applicable, when providing that advice. The following represents our written acknowledgement of fiduciary status:

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. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

Under this special rule's provisions, 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.

Financial Life Planners' clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Michele Dallmann at (720) 536-0660 or mdallmann@advisorlawyer.com.

## Item 12 – Brokerage Practices

Specific custodian or brokerage recommendations are made to clients based on their need for such services. We recommend custodians based on the proven integrity and financial responsibility of the firm, best execution of orders at reasonable commission rates, industry reputation, and the quality of client service. Among the factors we look at in recommending the use of a broker-dealer/custodian, we seek one who will hold your assets and execute transactions on terms that are generally most advantageous when compared to other available providers. We consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services.
- Capability to execute, clear, and settle securities transactions.
- Breadth of available investment products.
- Competitiveness of the price of the services.
- Reputation, financial strength, and stability.
- Prior service to us and our other clients.

We do not request, recommend, or require clients to direct brokerage. This may be different from other investment advisers who may recommend, request, or require the practice.

Financial Life Planners may recommend that clients establish brokerage accounts with the Fidelity Investments division of Fidelity Brokerage Services LLC (Fidelity), which is a registered broker-dealer and SIPC member, to maintain custody of clients' assets and to effect trades for their accounts. Financial Life Planners is independently owned and operated and is not affiliated with Fidelity.

Fidelity provides Financial Life Planners with access to its institutional trading and custody services, which are usually not available to Fidelity retail investors. These services include, but are not limited to, brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

These services are generally available to independent investment advisors on an unsolicited basis and at no charge to them so long as a total of at least $10 million of the advisor's clients' assets is maintained in accounts at Fidelity. This creates a conflict of interest for us to recommend Fidelity. This conflict of interest is mitigated, if not eliminated, since our investment advice is independent of any services we receive from Fidelity and is otherwise not contingent upon us committing to Fidelity any specific amount of business or trading activity.

Financial Life Planners participates in the institutional customer program Schwab Advisor Services, (the "Program") offered by Charles Schwab and Co., Inc. ("Schwab"). and FLP may recommend Schwab to clients for custody and brokerage services. There is no direct link between FLP's participation in the program and the investment advice it gives to its clients, although FLP receives economic benefits through its participation in the program that are typically not available to Schwab retail investors. Financial Life Planners is independently owned and operated and is not affiliated with Schwab.

Schwab provides Financial Life Planners with access to its institutional trading and custody services, which are usually not available to Schwab retail investors. These services include, but are not limited to, brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

These services are generally available to independent investment advisors on an unsolicited basis and at no charge to them. This creates a conflict of interest for us to recommend Schwab. This conflict of interest is mitigated, if not eliminated, since our investment advice is independent of any services we receive from Schwab and is otherwise not contingent upon us committing to Schwab any specific amount of business or trading activity.

Clients of Financial Life Planners who choose to maintain accounts at Fidelity or Schwab are not charged for custodial services; however, clients are charged commissions or other transaction related fees for securities trades that are executed through Fidelity or Schwab or that settle into Fidelity or Schwab accounts. FLP does not receive or utilize soft dollars, nor do we enter into any soft-dollar arrangements with broker-dealers. We do not receive compensation directly or indirectly from any source other than fees paid to us by our clients. Cynthia Fick, Matt Fick, and Gina Giachetti Wight neither receive commissions of any sort, nor does Financial Life Planners receive a share of any fees collected by account custodians or mutual fund companies.

Although we will recommend Fidelity or Schwab as a broker-dealer/custodian for your accounts, clients may direct brokerage. In these cases, we may not be able to achieve the most favorable execution of your securities transactions resulting in more cost to you.

When instructing the broker-dealer/custodian to purchase or sell securities for your accounts, we do not aggregate, or block trade, orders. This may result in a higher or lower price for an individual security. Based on how we manage our portfolios we do not believe that clients are disadvantaged but do receive best execution under the circumstances.

## Item 13 – Review of Accounts

Client accounts are reviewed according to the following schedule:

**Daily Review**: our primary custodians, Fidelity and Schwab, provide Financial Life Planners with a daily electronic data file containing all client account transactions and positions. Accounts are monitored and reconciled to the custodian daily.

**Semi-Annual Review**: All accounts are reviewed every six months in relation to their target portfolio weights, market movements, changes in fund recommendations, and shifts in target asset allocations.

**Annual Review**: In addition to the above, we seek to meet with clients at least once per year to stay informed regarding their personal situation and to determine whether the established Investment Policy remains appropriate. All portfolios are rebalanced at least once per year.

**Upon Client Request:** In addition to the above, we periodically review client accounts in relation to new information presented by the client or to provide information requested by the client.

All reviews, whether initiated by Client or Advisor, are performed by Cynthia K. Fick, Gina Giachetti Wight or Matthew Fick

Factors that may trigger a review in addition to those listed above include withdrawals from a client portfolio, additions to a client portfolio, changes to our tactical investment strategies, changes to our approved list of investments, and extreme market conditions that would trigger a rebalancing of the portfolio prior to the next six-month review date.

Clients receive monthly, but no less than quarterly, account statements showing holdings and transactions. Account statements are sent from the account custodian. In addition, Financial Life Planners provides as agreed consolidated performance reports and portfolio statements. Clients may elect to have reports from Fidelity, Schwab and Financial Life Planners delivered electronically (via e-mail and website access) or via U.S. mail.

## Item 14 – Client Referrals and Other Compensation

FLP is not paid in cash or by any other economic benefit from a non-client in connection with giving advice to clients, nor does the firm or any related person provide direct or indirect compensation to any person who is not a Supervised Person for client referrals.

Neither the firm nor any related person receives client referrals from a broker-dealer or third-party custodian.

As disclosed under Item 12, above, Financial Life Planners participates in custodians' institutional customer programs and Financial Life Planners may recommend custodians to Clients for custody and brokerage services. There is no direct link between Financial Life Planners' participation in the program(s) and the investment advice it gives to its clients, although Financial Life Planners receives economic benefits through its participation in the program(s) that are typically not available to 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 Financial Life Planners participants; access to block trading: the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Financial Life Planners by third party vendors. Custodians may also have paid for business consulting and professional services received by Financial Life Planners' related persons. Some of the products and services made available through the program(s) may benefit Financial Life

Planners but may not benefit its client accounts. These products or services may assist Financial Life Planners in managing and administering Client accounts, including accounts not maintained at the custodian. Other services made available by custodians are intended to help Financial Life Planners manage and further develop its business enterprise. The benefits received by Financial Life Planners or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to the custodian. As part of its fiduciary duties to clients, Financial Life Planners endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Financial Life Planners or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Financial Life Planners' choice of for custody and brokerage services.

For referring previous clients to FLP, Nancy Hetrick's company Smarter Divorce Solutions, LLC receives a percentage of the client's management fee paid quarterly in arrears.

## Item 15 – Custody

Clients receive quarterly or monthly statements from the custodian that holds and maintains clients' investment assets. Many clients elect to receive these statements electronically, which requires them to establish a user ID and password and to login to Fidelity's website or Schwab's website to review their accounts.

Financial Life Planners urges all clients to carefully review these statements and compare Fidelity and Schwab's official custodial records to the account statements that we provide. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

In addition to comparing account values and securities transactions, Financial Life Planners urges clients to review our quarterly billing statements with the amount of fees deducted from client accounts.

Other than as a consequence of our authority to make withdrawals from client accounts to pay our advisory fees, we do not have custody. Written authorization to deduct advisory fees from client accounts held by a qualified custodian is provided by means of our advisory agreement.

## Item 16 – Investment Discretion

Financial Life Planners manages client accounts on a discretionary basis. Our discretionary authority includes the ability to do the following without contacting the client:

- determine the security to buy or sell.
- determine the broker-dealer to be used for a purchase or sale of securities; and/or
- determine the amount of the security to buy or sell.

Clients give us discretionary authority when they sign an investment advisory agreement with us.

## Item 17 – Voting Client Securities

As a matter of firm policy and practice, Financial Life Planners neither has the authority to nor do we vote proxies on behalf of advisory clients. Financial Life Planners may provide advice to clients regarding the client's voting of proxies. You may contact us at 480-477-8530 if you have questions about a particular solicitation.

## Item 18 – Financial Information

### Balance Sheet Requirement

Financial Life Planners is not the qualified custodian for Client funds or securities and does not require prepayment of fees of more than $1,200 per Client, six (6) months or more in advance.

### Financial Condition

Financial Life Planners does not have a financial condition reasonably likely to impair the Advisor's ability to meet contractual commitments to its Clients.

### Bankruptcy Petition

Financial Life Planners has not been the subject of a bankruptcy petition at any time in the past 10 years.