

brokerage firm. We do not receive any portion of these other fees. We do not receive commissions or third-party payments of any kind. The only compensation we receive is in the form of hourly fees paid directly by the client.

Termination of Services

Either party may terminate the Agreement at any time, which will typically be in writing. Should the Client verbally notify the Firm of the termination and, if in two business days following this notification the Firm has not received notice in writing; the Firm may make written notice of such termination in its records and will send its own termination notice to the Client as a substitute. If the Firm's ADV Part 2 was not delivered at least 48 hours prior to entering into the investment advisory contract, then the Client has the right to terminate the engagement without penalty within five business days after entering into the agreement. Should the Client terminate the engagement after this period, he/she/it will be assessed fees on a prorated basis for services incurred from either (a) as a new Client, the date of the engagement to the date of the Firm's receipt of written notice of termination, or (b) all other accounts, the last billing period to the date of the Firm's receipt of written notice of termination.

In the case of any prepaid fees, the Firm will promptly return any unearned amount upon receipt of a written termination notice and not beyond 30 days of receipt of notice. However, should an educational workshop attendee cancel 48 hours or more in advance of the scheduled event, the prepaid fee will either be refunded or applied to the attendance of a future presentation. Any workshop event terminations within 48 hours of the first session will not be refunded.

Item 6: Performance-Based Fees & Side-by-Side Management

Sharing of Capital Gains or Capital Appreciation

Financial Freedom Planners does not charge fees based on a share of capital appreciation of the funds of an advisory contract, also known as performance-based fees. We also do not provide ongoing investment management services, so issues related to side-by-side management are not applicable.

Item 7: Types of Clients

Description

Financial Freedom Planners provides its services primarily to individuals and high-net-worth individuals.

Account Minimums

Financial Freedom Planners does not require minimums as to income, assets, net worth, length of engagement, revenues generated or other conditions for engaging our services.

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

Methods of Analysis

If Financial Freedom Planners is engaged to provide investment advice, first, we gather information about the client's personal financial situation and then conduct a meeting with the client to clarify the client's personal financial information and determine the client's specific needs, objectives, goals and tolerance for risk. We employ a fundamental, long-term, buy-and-hold philosophy in regards to investment advice. We favor a passive approach to investing.

Investment Strategies

We recommend a proper asset allocation based on the client's personal financial situation. We make asset allocation and investment policy decisions using our best judgment to help the client achieve their overall financial objectives and goals while minimizing risk exposure. We believe that the appropriate allocation of assets across diverse investment categories (i.e. stock vs. bond, foreign vs. domestic, large cap. vs. small cap., high quality vs. high yield, etc.) is the primary determinant of portfolio returns and is critical to the long-term success of a client's financial objectives and goals. Then, we recommend specific investments, primarily low-cost, no-load, index investments, to fill out the recommended asset allocation. Next, we recommend that the portfolio be maintained by rebalancing about annually and/or making adjustments as needed.

Risk of Loss

While we believe our investment strategy is designed to potentially produce the highest possible return for a given level of risk, it cannot guarantee that an investment objective or goal will be achieved. Some investment decisions made by us may result in loss, which may include the original principal amount invested. The client must be able to bear the various risks involved in investing, which may include market risk, liquidity risk, interest rate risk, business risk, currency risk or political risk, among others.

Some of our strategies will use low-cost mutual funds or ETFs, which will be subject to essentially the same risks as those associated with the direct ownership of the securities comprising the index on which the ETF or fund is based. Additionally, the value of the investment will fluctuate in response to the performance of the underlying index.

Investments in international and emerging markets securities include exposure to risks such as currency fluctuations, foreign taxes and regulations, and the potential for illiquid markets and political instability.

Small- and mid-cap companies may be hindered as a result of limited resources or less diverse products or services and have therefore, historically been more volatile than the stocks of larger, more established companies.

There are special risks associated with an investment in real estate, including credit risk, interest rate fluctuations and the impact of varied economic conditions.

High-yield bonds, also known as "junk bonds" are subject to greater risk of loss of principal and interest, including default risk, compared with higher rated (higher quality) bonds.

Any commodity purchase represents a transaction in a non-income-producing asset and is highly speculative. Therefore, commodities and commodities linked investments should not represent a significant portion of an individual's portfolio.

Similarly, investments in foreign currencies and foreign currency-linked investments are highly speculative and are subject to interest rate risk, exchange rate fluctuations and global political instability and therefore should not represent a significant portion of a individual's portfolio.

No guarantees can be offered that the client's goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Financial Freedom Planners will provide a better return than other investment strategies.

Item 9: Disciplinary Information

Legal and Disciplinary

Neither Financial Freedom Planners, LLC nor any of its personnel have been the subject of a reportable legal or disciplinary event.

Criminal or Civil Action

There are no criminal or civil actions pending against Financial Freedom Planners or any persons associated with the firm.

Administrative Proceeding

There are no administrative actions pending against Financial Freedom Planners or any persons associated with the firm.

Self-Regulatory Proceeding

There are no self-regulatory proceedings pending against Financial Freedom Planners or any persons associated with the firm.

Item 10: Other Financial Industry Activities and Affiliations

Neither Financial Freedom Planners, LLC nor any of its personnel are affiliated with or maintain a material relationship with another financial industry entity. Our policies require that we conduct business activities in a manner that avoids actual or potential conflicts of interest between the firm, personnel and the client, or that may otherwise be contrary to law. We will provide disclosure to the client, prior to and throughout the term of an engagement, of any conflicts of interest which will or may reasonably compromise our impartiality or independence.

Broker-Dealer or Registered Representative

Financial Freedom Planners is not registered as a securities broker-dealer, nor are we required to be. No management persons are registered, or have an application pending as a registered representative of a broker-dealer.

Futures Commission Merchant, Commodity Pool Operator, Commodity Trading Adviser or Associated Person

Neither Financial Freedom Planners nor any management persons are registered, or have an application pending, as a futures commission merchant, commodity pool operator or commodity trading advisor.

Material Relationships or Arrangements with Financial Industry Entity

In addition the firm does not have a material relationship with a municipal or government securities dealer or broker, a bank or thrift institution, a lawyer or law firm, a real estate broker or dealer, a pension consultant, a sponsor or syndicator of limited partnerships, or an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," or an offshore fund).

Referrals may be made or received to other professionals such as attorneys and accountants, but there is no formal or informal arrangement with them, nor are fees shared.

Mr. Roberts is a member in good standing with the Certified Financial Planner Board of Standards, Inc.

In addition Roberts is a member of the Garrett Planning Network (Garrett), an organization that assists financial planners in fee-only financial planning practices. Garrett is not a registered financial industry participant, nor do its activities require it to be. Financial Freedom Planners pays an annual membership fee to Garrett for extensive services that include training, compliance and operational support to enhance our ability to provide quality service and advice to our clients.

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

Code of Ethics

Financial Freedom Planners has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all associated persons of the firm. We accept the obligation not only to comply with the mandates and requirements of all applicable laws and regulation, but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities. We will be happy to provide a copy of our Code of Ethics to any client or prospective client, upon request.

The Code is designed to ensure that the high ethical standards maintained by Financial Freedom Planners continue to be applied. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflict of interest, insider trading and other forms of prohibited or unethical business conduct. Every employee of the firm is given a copy of the Code and must provide to the chief compliance officer a signed document indicating that they have read and understand all of the provisions of the Code.

As mentioned before, Mr. Roberts is a CFP® Professional and as such is subject to the CFP® Board's *Standards of Professional Conduct*. These standards set forth the ethical guidelines for CFP® professionals and are actively enforced through an investigative and disciplinary process. Enforcement of these standards is one of the key elements that distinguish the CFP® professional from other financial industry credentials. In order to remain certified, each CFP® professional must complete a two-hour ethics course every biennium and sign an affidavit that they will comply with the standards. Failure to uphold the *Standards of Professional Conduct* could result in disciplinary action up to and including revocation of the right to use the CFP® marks.

Recommend Securities with Material Financial Interest

Neither Financial Freedom Planners nor any of its personnel are authorized to recommend or affect a transaction for a client involving any security in which the firm or a related party has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc. Additionally, we are prohibited from borrowing from or lending to a client, unless that client is an approved financial institution. In such instances, authorization for the loan must be granted in advance and documented in writing.

Invest in Same Securities Recommended to Clients

At times personnel and related parties may hold positions in investments that are also recommended to the client. We may make recommendations or take actions with respect to investments that may differ in the nature or timing from recommendations made to, or actions taken for, other clients or personnel. However, at no time will the personnel or any related party receive preferential treatment over the client.

Financial Freedom Planners' Code of Ethics establishes rules of conduct for all employees and is designed to, among other things, govern personal securities trading activities in the accounts of employees, immediate family and accounts in which an employee has a beneficial interest. The Code is based upon the principle that Financial Freedom Planners and its employees owe a fiduciary responsibility to the firm's clients. As such, the firm and its employees are required to conduct their affairs, including personal securities transactions, in such a manner as to avoid:

- Serving their own personal interests ahead of clients
- Taking inappropriate advantage of their position with the firm, and
- Any actual or potential conflicts of interest or any abuse of their position of trust and responsibility

Item 12: Brokerage Practices

Selecting Brokerage Firms

Financial Freedom Planners, LLC is not affiliated with any bank, custodian or brokerage firm. If we are engaged to provide investment advice, we will offer to use the service provider with whom the client's assets are currently maintained. If the client prefers to use a new service provider, we will recommend one based on the need, overall cost and ease of use for the client. Examples of firms we would consider recommending are low-cost providers like Scottrade, Charles Schwab, and Fidelity.

Research and Soft Dollars

We do not receive nor do we pay up to receive additional services.

Brokerage for Client Referrals

The only compensation we receive is in the form of hourly fees paid directly by the client. Therefore, we do not receive any additional compensation when the client engages a recommended brokerage firm or other service provider

Directed Brokerage

We do not require or engage in directed brokerage involving our accounts nor do we allow clients to engage in the same.

Item 13: Review of Accounts

Periodic Reviews

Financial Freedom Planners does not provide continuous monitoring of its financial planning and investment advice services. Periodic reviews are recommended and it is the client's responsibility to initiate these reviews. We remind the client to notify us of any changes to their personal financial situation.

If the firm is engaged to review client accounts, the review will be performed by Mr. Roberts. The clients will always receive the official account statements and transaction confirmations directly from their custodian. These official documents should be read carefully and compared to any report received from the firm.

Item 14: Client Referrals and Other Compensation

Economic Benefits

Financial Freedom Planners does not receive, nor does it pay, any fees for client referrals.

Third-Party Solicitors

Financial Freedom Planners does not utilize the services of third-party solicitors.

Item 15: Custody

Account Statements

Financial Freedom Planners does not take custody of client cash, bank accounts or securities. The client's cash, bank accounts and securities will be maintained by unaffiliated, qualified custodians, such as banks, brokerage firms, mutual fund companies and transfer agents. The client will receive account statements directly from their service provider. These statements are typically provided on a monthly or quarterly basis or as account transactions occur.

We will not ask for, nor accept, any of the client's account access information, such as username and/or password, even for the accommodation of the client or the client's legal agent.

Firm personnel will not act as trustee for, or have general power of attorney over, a client account.

Item 16: Investment Discretion

Discretionary Authority for Trading

Financial Freedom Planners does not provide discretionary investment management services, so issues related to investment discretion are not applicable.

Item 17: Voting Client Securities

Proxy Voting

Financial Freedom Planners does not vote client securities. The client will maintain responsibility for directing the manner in which proxies are voted, as well as all other elections relative to mergers, acquisitions, tender offers or other events pertaining to the client's investments. The client will receive their proxies and other solicitations directly from the custodian or transfer agent for their investments.

Item 18: Financial Information

Financial Condition

Financial Freedom Planners has no financial commitments that would impair its ability to meet any contractual and fiduciary responsibilities to clients, nor has the firm been the subject of a bankruptcy proceeding.

Due to the nature of our services, an audited balance sheet is not required, nor included in this disclosure document. Financial Freedom Planners, LLC does not have any financial conditions that require further disclosure.

Item 19: Requirements for State-Registered Advisers

Principal Executive Officers and Management Persons

Charles R. Roberts, born 1952

Formal Education

Mr. Roberts earned a Bachelor of Arts in Economics (with honors) from Pennsylvania State University.

In addition, he is a graduate of the University of Pennsylvania, Wharton School's Securities Industry Institute, a three-year executive program.

Mr. Roberts graduated from the College of Financial Planning in 1986.

Business Background

Mr. Robert's long career in financial services began in 1977 when he joined Merrill Lynch as an Account Executive. He joined Paine Webber in 1979 as a Financial Advisor, and over seven years graduated from the Paine Webber Management Development Program, became an Assistant and Branch Manager, was the Regional Director of Insurance, and founded a Financial Planning practice.

After seven years with Paine Webber he became a Branch Manager and acting Regional Sales Manager at Prudential Securities. In 1989, Mr. Roberts returned to Paine Webber as the St. Louis Complex Manger, where he was responsible for three branch offices.

After this assignment, Mr. Roberts spent almost two decades in senior management with broker dealer and advisory financial services firms. He joined Stifel Nicholas in St. Louis as the Eastern Regional Manager, where he was responsible for the eastern half of the United States. In 1994, Mr. Roberts assumed the position of Director of Sales and Branches at First of Michigan where he was responsible for 33 branch offices. Three years later, he became the President and CEO of Branch Cabell & Co. in Richmond, VA. Following a merger with Royal Bank of Canada in 2003, Mr. Roberts accepted the position of Chairman, Wealth Management Services of Middleburg Financial Corporation. His responsibilities included overseeing a Trust Company, Investment Advisory firm, the Wealth Management operation in the bank, as well as assisting the founding of a bank-owned broker dealer. He then took over as the Chief Operating Officer at Thompson Davis in 2006, and was responsible for founding their Investment Advisory firm. Between 2007 and 2009, Mr. Roberts functioned as the President and CEO of Freedom Trading US. In 2009, he joined Cambridge Advisors where he served as Chief Executive Officer, Chief Investment Officer, and Chief Compliance Officer.

Additionally Mr. Roberts has served on numerous regulatory committees, such as the NASD (now FINRA) District 7 Committee and the NASD (now FINRA) Consultative Committee.

He currently serves as Financial Freedom Planners' Chief Executive Officer and Chief Compliance Officer, and owns 100% of the firm.

Description of Professional Designations

Mr. Roberts is a CERTIFIED FINANCIAL PLANNER™ (CFP®) Professional. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 69,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® Professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics Renewal** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial

planning services at a fiduciary standard of care. This means CFP® Professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Investment-Related Other Business Activities

Aside from being an investment advisor representative with Financial Freedom Planners, Mr. Roberts is not involved in any other investment related activities, nor does he have a material relationship with the issuer of a security.

Additional Compensation

Neither Financial Freedom Planners, LLC nor any of its personnel accept or receive additional economic benefit (i.e. sales awards or other prizes) for providing advisory services to clients, nor do they receive performance-based fee compensation.

Legal or Disciplinary Events

Investment advisor representatives are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. There are no current or pending criminal or civil actions, administrative proceedings or Self-Regulatory Organization proceedings against Mr. Roberts.

Mr. Roberts is a member in good standing with the CFP Board of Standards.