

FORM ADV PART 2A

Investment Advisor Brochure

FC ADVISORY, LLC

("Financial Coach" / "New Wealth Project")

January 06, 2021

This brochure provides information about the qualifications and business practices of FC ADVISORY, LLC (doing business as "Financial Coach" and doing business as "New Wealth Project"). If you have any questions about the contents of this Brochure, please contact us at 484-887-0452. 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 advisor does not imply any level of skill or training.

Additional information about FC Advisory, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

FC Advisory, LLC's CRD number is: 170478.

FC ADVISORY, LLC
940 E. Boot Rd., Suite 101
West Chester, PA 19380

NEW WEALTH PROJECT
P: (484) 983-3308
service@thenewwealthproject.com
www.thenewwealthproject.com

FINANCIAL COACH
P: (484) 887-0452
compliance@financialcoachgroup.com
www.financialcoachgroup.com

Item 2: Material Changes

FC Advisory, LLC reviews our policies and procedures on a regular basis to evaluate their continuing effectiveness. As a result of this process or due to changes in our business, we may amend this Form ADV from time to time.

Materials changes since our last Form ADV Annual Amendment update on June 30, 2020 are below. This list summarizes changes to policies, practices, or conflicts of interests only.

- Item 5. has been updated to reflect changes to Financial Coach and New Wealth Project Advisory Fee Schedules
- Item 14.B. has been updated to disclose FCADV's engagement in solicitor arrangements and to disclose Zoe Financial, Inc. as a solicitor

FC Advisory, LLC's Form ADV may be requested at any time, without charge, by contacting us at (484) 887-0452.

Item 3: Contents

Item 2: Material Changes	2
Item 3: Contents.....	3
Item 4: Advisory Business	5
A. Description of the Advisory Business	5
B. Types of Advisory Services.....	5
Financial Plan DEVELOPMENT	5
Financial Plan IMPLEMENTATION.....	5
C. Client Tailored Services and Client Imposed Restrictions	6
D. Wrap Fee Programs	6
E. Assets Under Management	6
Item 5: Fees and Compensation.....	6
A. Fee Schedules	6
FINANCIAL COACH	6
NEW WEALTH PROJECT	7
B. Payment of Fees	7
Financial Plan DEVELOPMENT (one-time “planning fee”).....	7
Financial Plan IMPLEMENTATION (ongoing “Advisory Fees”).....	7
C. Client Responsibility for Third Party Fees	8
D. Prepayment of Fees	8
E. Outside Compensation for the Sale of Securities to Clients.....	8
Item 6: Performance-Based Fees and Side-By-Side Management.....	8
Item 7: Types of Clients	8
Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss	8
A. Methods of Analysis and Investment Strategies	8
B. Material Risks Involved	9
General Risks of Owning Securities	9
C. Risks of Specific Securities Utilized	9
Item 9: Disciplinary Information.....	9
A. Criminal or Civil Actions	9
B. Administrative Proceedings.....	9
C. Self-Regulatory Organization (SRO) Proceedings	9
Item 10: Other Financial Industry Activities and Affiliations.....	9
A. Registration as a Broker/Dealer or Broker/Dealer Representative	9
B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor	10
C. Registration Relationships material to this Advisory Business and Possible Conflicts of Interests.....	10
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	10
A. Code of Ethics	10
B. Recommendations Involving Material Financial Interests	10
C. Investing Personal Money in the Same Securities as Clients	10
D. Trading Securities at/around the Same Time as Client’s Securities	10
Item 12: Brokerage Practices	10
A. Factors Used to Select Custodians and/or Broker/Dealers.....	10
Research and Other Soft Dollar Benefits	11
Brokerage for Client Referrals	11
Clients Directing Which Broker/Dealer/Custodian to Use	11
B. Aggregating (Block) Trading for Multiple Client Accounts	12
Item 13: Reviews of Accounts	12

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews	12
B. Factors that will trigger a Non-Periodic Review of Client Accounts.....	12
C. Content and Frequency of Regular Reports Provided to Clients	12
Item 14: Client Referrals and Other Compensation	12
A. Economic Benefits Provided by Third parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)	12
B. Compensation to Non-Advisory Personnel for Client Referrals	12
Item 15: Custody	13
Item 16: Investment Discretion	13
Item 17: Voting Client Securities (Proxy Voting).....	13
Item 18: Financial Information	13
A. Balance Sheet	13
B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients	13
C. Bankruptcy Petitions in Previous Ten Years	13

Item 4: Advisory Business

A. DESCRIPTION OF THE ADVISORY BUSINESS

FC Advisory, LLC is a Limited Liability Company organized in the State of Pennsylvania. FC Advisory, LLC is doing business as "Financial Coach" and doing business as "New Wealth Project", (hereinafter jointly referred to as "FCADV"). The firm was formed in February 2014, and the principal owners are Owen Francis Mulhern IV, Jeffrey Mastronardo, Michael Traynor, and Meghan Tait. FCADV acts in the capacity of a fiduciary and as such, is always obligated to place the interests of our clients first.

B. TYPES OF ADVISORY SERVICES

FCADV offers advisory services, including Financial Planning and Portfolio Management, to retail investors through Financial Coach and New Wealth Project. Both financial plan development and financial plan implementation incorporate a client's personal values, objectives, limitations, time horizon, and risk tolerance levels.

- **FINANCIAL COACH** advisory services are intended for individuals and couples who are retired or approaching retirement (**usually within 5-10 years of retirement**)
- **NEW WEALTH PROJECT** advisory services are intended for young families and emerging professionals/business leaders

Financial Plan DEVELOPMENT

Financial Planning includes assessing a client's current situation, financial outlook, and personal objectives, setting goals and objectives, and developing specific strategies designed to help achieve stated goals. Both Financial Coach and New Wealth Project develop financial plans through a series of Planning Modules in exchange for a one-time Advisory Fee (or "planning fee"). This engagement ("Financial Plan Development") is typically a client's first formal engagement with FCADV and concludes with delivery of a recommended strategy for financial plan implementation. FCADV is not a licensed tax or legal professional and does not provide accounting or legal services. Services rendered should not be interpreted as legal or accounting advice.

Financial Plan IMPLEMENTATION

"Financial Plan Implementation" typically includes ongoing financial planning combined with portfolio management services in exchange for an annual Advisory Fee.

ONGOING PORTFOLIO MANAGEMENT

Portfolio Management includes asset allocation and portfolio construction, security selection and implementation, and the ongoing monitoring of a client's investment portfolio, including performance reporting, asset allocation analysis, rebalancing, and tax loss harvesting recommendations.

All client portfolios are customized and built for each individual relationship, based on the individual goals, objectives, time horizon and risk tolerance of each client, although many clients will hold similar securities and allocations. We evaluate client portfolios, at least annually, with respect to each individual client's goals, objectives, time horizon, risk tolerance, changes to the client's financial situation (such as retirement, termination of employment, physical move or inheritance), as well as current market, economic or political events. Investment recommendations are primarily limited to open end mutual funds and exchange-traded funds, ("ETFs"). We do not advise clients to invest in individual stocks and bonds but do serve to advise clients with existing positions in individual stocks and bonds.

FCADV typically manages accounts on a discretionary basis, which means clients provide the authority for us to buy and sell securities for their accounts at our discretion without permission from the client prior to each transaction. Discretionary authority is given to us at the time a client signs the Investment Advisory Agreement and continues for the duration of our advisory relationship, provided that a client may, at any time, upon delivery of written notice to us, terminate any discretionary authority granted by the client to FCADV.

ONGOING FINANCIAL PLANNING

Both Financial Coach and New Wealth Project offer ongoing financial planning services to clients in both a systematic and on-demand nature. We evaluate client financial plans at least annually with respect to each individual client's goals, objectives, time horizon, risk tolerance, changes to the client's financial situation (such as retirement, termination of employment, physical move or inheritance), as well as current market, economic or political events. We expect clients to alert us whenever significant changes occur within their financial situation.

Financial Coach: Ongoing planning services offered through Financial Coach may include, but is not limited to, retirement income planning (including Social Security and Pension), comprehensive investment allocation recommendation, Life/LTC review and recommendation, and coordination of an estate document review, health insurance/Medicare planning, and elder care planning with outside professionals.

New Wealth Project: Ongoing planning services offered through New Wealth Project may include, but is not limited to, cash flow planning, investment allocation recommendation (including retirement plans and college savings accounts), insurance plan review and recommendation, and coordination of an estate document review with an outside professional.

AUTOMATED INVESTMENT PROGRAM

FCADV occasionally uses an Automated Investment Program (“AIP”) which integrates the personalized touch of a trusted advisor with the convenience of a digital (“robo-advisor”) platform. Client assets, invested in portfolios enrolled through FCADV’s AIP, (the “Portfolio”), are held in brokerage account(s) at Charles Schwab & Co., Inc. (“CS&Co.”) and are subsequently operated by FCADV through the Institutional Intelligent Portfolios® platform (“Platform” or “Schwab’s Platform”), offered by Schwab Performance Technologies (“SPT”), a software provider to independent investment advisors and an affiliate of CS&Co. FCADV is independent of and not owned by, affiliated with, or sponsored or supervised by SPT, CS&Co., or their affiliates (together, “Schwab”).

Allocation recommendations, which are generated using information obtained from the Client through an online questionnaire and interviews with FCADV’s Investment Adviser Representatives, (“IAR”s), are selected from a range of investment strategies constructed by FCADV, each consisting of a portfolio of exchange-traded funds (“ETF”s) and cash allocation. IAR reviews generated allocation(s) prior to implementation of Client’s Portfolio to determine the appropriateness of the recommendation. Client provides IAR discretionary authority to adjust the allocation of the Portfolio as necessary to ensure the suitability of the investment strategy with Client’s investment needs and goals.

FCADV, and not Schwab, are the client’s investment advisor and primary point of contact with respect to the AIP and is solely responsible for determining the appropriateness of the AIP for the client, choosing a suitable investment strategy and portfolio for the client’s investment needs and goals, and managing that portfolio on an ongoing basis. FCADV has contracted SPT to provide the Platform, which consists of technology and related trading and account management services. The Platform enables FCADV to make AIP available to clients online and includes a system that automates certain key parts of FCADV’s investment process.

C. CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS

Clients may request restrictions on and customizations to their accounts. FCADV reserves the right to not accept and/or to terminate management of a client account if it feels that the client’s-imposed restrictions would not be in the client’s best interest or limit or prevent meeting or maintaining the client’s investment strategy.

FCADV occasionally offers general investment guidance on any investment type held by the client at the start of the advisory relationship. FCADV may also offer guidance regarding additional types of investments, if appropriate, to address the individual needs, goals, and objectives of the client or in response to client inquiry. FCADV typically does not invest in individual equity securities, except for exchange-traded funds (ETFs) that trade during the day like individual securities. It will typically only transact in individual equities or individual fixed income securities when liquidating existing holdings of new client accounts.

D. WRAP FEE PROGRAMS

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. FCADV does not participate in any wrap fee program.

E. ASSETS UNDER MANAGEMENT

FCADV has \$222,975,352 of solely discretionary assets under management as of December 31, 2020.

Item 5: Fees and Compensation

A. FEE SCHEDULES

FINANCIAL COACH

Advisory services provided through Financial Coach are intended for individuals and couples who are retired or approaching retirement (usually within 5-10 years of retirement). Financial Coach offers one-time Financial Plan Development and ongoing Financial Plan Implementation according to the following fee schedules.

FINANCIAL PLAN DEVELOPMENT

Your Retirement Gameplan® – Financial Coach develops financial plans through a series of “Planning Modules” in exchange for a flat-rate planning fee.

- Module #1: Retirement & Income Planning
- Module #2: Allocation & Investment Planning
- Module #3: Insurance Planning
- Module #4: Estate, Medicare & Other Needs

Plan Development Fees range from \$2,500 to \$5,000

FINANCIAL PLAN IMPLEMENTATION

Financial Coach Supernova services include ongoing financial planning and portfolio management in exchange for an annual asset-based Advisory Fee, charged according to the following tiered fee schedule:

- First \$1 million of AUM **1.25 %**
- Next \$1 - \$2 million **1.00 %**
- Next \$2 - \$3 million **0.75 %**
- Next \$3 - \$5 million **0.50 %**
- Above \$5 million of AUM **0.10 %**

NEW WEALTH PROJECT

Advisory services provided through New Wealth Project are intended for young families and emerging professionals/business leaders. New Wealth Project offers **one-time Financial Plan Development** and **ongoing Financial Plan Implementation** according to the following fee schedules. Financial Plan Implementation through New Wealth Project requires a minimum \$2,500 annual Advisory Fee.

FINANCIAL PLAN DEVELOPMENT		FINANCIAL PLAN IMPLEMENTATION	
The Project – New Wealth develops financial plans through a series of “Planning Modules”, each of which is offered individually (“A La Carte”) or collectively, in exchange for a flat-rate planning fee.		New Wealth Project “Maintenance” services include ongoing financial planning and portfolio management in exchange for an annual asset-based Advisory Fee, charged according to the following tiered fee schedule:	
• Module #1: Cash Flow Roadmap	\$ 500	• First \$1 million of AUM	0.75 %
• Module #2: Capital Growth Formula	\$ 500	• Next \$1 - \$2 million	0.60 %
• Module #3: Protection Solution	\$ 500	• Next \$2 - \$3 million	0.45 %
		• Next \$3 - \$5 million	0.30 %
		• Above \$5 million of AUM	0.10 %
		• <i>Minimum Annual Advisory Fee</i>	\$ 2,500
Plan Development Fee (collectively):	\$ 1,200		

The amount a client pays for Plan Development and/or Plan Implementation will depend on a variety of factors, for example: the complexity of their situation; the services they receive and whether such services are provided through **Financial Coach** or **New Wealth Project**; the number of interactions with our financial professionals, whether the support received is primarily human- or technology-based; and the amount of assets in their advisory accounts. **The final fee schedule is identified in each client’s Investment Advisory Agreement, (the “Agreement”).**

Asset-based Advisory Fees are calculated as a percentage of assets under management and/or advisement (“AUM”), billed on a pro-rata annualized basis quarterly in advance based on the value of the client’s account(s) on the last day of the previous quarter, and are automatically deducted from each client’s advisory account(s) by the account’s Custodian upon their receipt of instruction by FCADV.

Fees are negotiable at FCADV’s discretion; FCADV may offer discounted rates to its employees and their families as well as to institutional and high net worth clients with substantial portfolio balances.

AUTOMATED INVESTMENT PROGRAM (AIP) FEES

For clients enrolled through FCADV’s AIP, the above Fee Schedules apply. Advisory Fees associated with these services are not set or supervised by Schwab. Clients do not pay brokerage commissions or any other fees to Schwab as part of FCADV’s AIP services. Schwab does not receive other revenues in connection with the AIP.

FCADV does not pay SPT fees for the AIP so long as \$100 million in client assets is maintained in accounts at Schwab that are not enrolled in the AIP. If this condition is not met, FCADV will pay SPT an annual licensing fee of 0.10% (10 basis points) on the value of clients’ assets in the AIP. This fee arrangement gives FCADV an incentive to recommend or require that clients with accounts not enrolled in the AIP be maintained with Schwab.

B. PAYMENT OF FEES

Financial Plan DEVELOPMENT (one-time “planning fee”)

Clients may elect to pay Financial Planning Fees by either (i) check(s) payable to FC Advisory, LLC, or (ii) electronic (“ACH”) payment(s) through a third-party payment processing vendor. The final arrangement for payment of Financial Planning Fees will be identified in the client’s Agreement, which must be completed prior to the delivery of any financial planning work, formal recommendations, and/or material.

Financial Plan IMPLEMENTATION (ongoing “Advisory Fees”)

DIRECT DEBIT OF ADVISORY FEE BY CUSTODIAN

Unless otherwise agreed upon in writing, asset-based Advisory Fees (payment for ongoing Financial Plan Implementation) shall be automatically deducted from each client’s advisory account(s) by the account’s Custodian upon their receipt of instruction by FCADV. Each quarter, the Custodian will withdraw the amount of the Advisory Fee due and payable to FCADV from each applicable account.

At the time of signing FCADV’s Investment Advisory Agreement, clients provide FCADV the authority to instruct the account’s Custodian to directly debit FCADV’s Advisory Fees from the client’s account(s). Clients authorize the Custodian to debit the account(s) for the amount of the Advisory Fees, and to directly remit that payment to FCADV in compliance with regulatory procedures, at the time of signing the Custodian’s custodial/clearing agreement during the account opening process. Statements sent to clients by the Custodian for the period following the applicable quarterly billing cycle end will reflect the Advisory Fee paid by the client to FCADV.

DIRECT PAYMENT BY CLIENT

Alternatively, clients may arrange to pay annual Advisory Fees by either (i) check(s) payable to FC Advisory, LLC, or (ii) electronic ("ACH") payment(s) through a third-party payment processing vendor. Any alternative arrangement for payment of Advisory Fees will be identified in the client's Agreement.

C. CLIENT RESPONSIBILITY FOR THIRD PARTY FEES

Clients may be responsible for the payment of third-party fees. Clients typically pay all transaction fees, stock transfer fees, and/or other similar charges incurred in connection with transactions in their accounts.

In addition, any mutual fund shares and/or ETFs held in a client's account may be subject to fund related fees and expenses that are described in the prospectus of the mutual funds or ETFs. All fees paid to FCADV are separate and distinct from the fees and expenses charged by mutual funds and ETFs.

D. PREPAYMENT OF FEES

FCADV collects its fees in advance pursuant to Item 5 of this brochure.

Financial Plan Development fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

Refunds for Advisory Fees paid in advance will be returned within fourteen (14) days to the client via check or return deposit back into the client's account.

E. OUTSIDE COMPENSATION FOR THE SALE OF SECURITIES TO CLIENTS

FCADV is a fee-only financial advisory firm and is compensated solely by fees paid directly by the client. We do not accept commissions or compensation from any other source.

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

FCADV does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

FCADV offers advisory services, including Financial Planning and Portfolio Management, to individuals and high net-worth individuals through [Financial Coach](#) and [New Wealth Project](#).

- **Financial Coach advisory services are intended for individuals and couples who are retired or approaching retirement (usually ages 55 years and older).**
- **New Wealth Project advisory services are intended for young families and emerging professionals and business leaders (usually ages 30-55 years).**

Clients eligible to enroll in FCADV AIP include individuals, IRAs, and revocable living trusts. Clients that are organizations (such as corporations and partnerships) or government entities, and clients that are subject to the Employee Retirement Income Security Act of 1974, are not eligible for FCADV AIP. The minimum investment required to open an account in FCADV AIP is \$5,000. The minimum account balance to enroll in FCADV AIP's tax-loss harvesting feature is \$50,000.

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

A. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

FCADV employs diversification in an effort to optimize the risk and potential return of a portfolio. More specifically, multiple asset classes, investment styles, market capitalizations, sectors, and regions may be utilized to provide diversification.

FCADV's general investment strategy may use stocks, open end (mutual funds), closed end funds, variable annuity trusts (equivalent to a mutual fund but held inside a variable annuity), ETFs or money market funds to seek a total return proportionate with the level of risk the client decides to take. FCADV assists each client in developing an investment plan, which is done by understanding the client's general financial situation, investment objectives, liquidity needs, time horizon, return objective, and risk tolerance, as well as any special considerations and/or restrictions the client chooses to place on the management of the client accounts as agreed upon by FCADV. Based on this information, FCADV determines the securities that comprise each client's portfolio and then makes investment strategy recommendations that are consistent with the client's investment plan.

FCADV offers several different investment strategies for managing client accounts. Based on the client's personal situation, FCADV will recommend managing the client's accounts in accordance with one or multiple asset allocation strategies.

Client portfolios with similar investment objectives and asset allocation goals may own the same or different securities. Income tax factors also influence FCADV's investment decisions. Clients who buy or sell securities on the same day may receive different prices based on the timing of the transactions during open market hours.

Each portfolio will maintain a target asset allocation. FCADV reviews client portfolios regularly to evaluate how closely the actual allocation matches the target allocation. When the variance is considered to be excessive, FCADV will take appropriate actions (by buying or selling securities) to bring the actual allocation within acceptable range of the target allocation. This process is referred to as "rebalancing." The process of rebalancing offers a systematic process to buy or sell securities when investment categories (asset classes) vary from their target allocation.

Investing in securities involves risk of loss.

B. MATERIAL RISKS INVOLVED

General Risks of Owning Securities

Prior to entering into an Investment Advisory Agreement with FCADV, each client should carefully consider that:

- Investing in securities involves risk of loss
- Securities markets experience varying degrees of volatility, and
- Over time, the client's assets may fluctuate and at any time be worth more or less than the amount invested.

FCADV does not guarantee that any investment strategy will meet its investment objectives or that an account will not suffer losses.

C. RISKS OF SPECIFIC SECURITIES UTILIZED

RISK OF LOSS

MUTUAL FUND AND/OR ETF ANALYSIS

Before selecting mutual fund(s) and/or ETF's, FCADV considers: the experience and track record of the manager of the mutual fund or ETF, in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions; and the underlying assets in a mutual fund or ETF, in an attempt to determine if there is significant overlap in the underlying investments held in other fund in the client's portfolio. On an ongoing basis, FCADV monitors the funds or ETFs to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as FCADV does not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable for the client's portfolio.

RISKS FOR ALL FORMS OF SECURITIES ANALYSIS

FCADV securities analysis method relies on the assumption that the companies whose securities are purchased and sold, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While FCADV is alert to indications that data may be incorrect, there is always a risk that analysis may be compromised by inaccurate or misleading information.

Item 9: Disciplinary Information

A. CRIMINAL OR CIVIL ACTIONS

There are no criminal or civil actions to report.

B. ADMINISTRATIVE PROCEEDINGS

There are no administrative proceedings to report.

C. SELF-REGULATORY ORGANIZATION (SRO) PROCEEDINGS

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. REGISTRATION AS A BROKER/DEALER OR BROKER/DEALER REPRESENTATIVE

FCADV does not have any relationships or arrangements with broker/dealers, mutual funds, other investment advisers, or other entities which are related persons that create any material conflict of interest for FCADV in rendering services to its clients.

B. REGISTRATION AS A FUTURES COMMISSION MERCHANT, COMMODITY POOL OPERATOR, OR A COMMODITY TRADING ADVISOR

Neither FCADV nor its representatives are registered as, or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. REGISTRATION RELATIONSHIPS MATERIAL TO THIS ADVISORY BUSINESS AND POSSIBLE CONFLICTS OF INTERESTS

FCADV does not have any relationships or arrangements with broker/dealers, mutual funds, other investment advisors, or other entities which are related persons that create any material conflict of interest in rendering services to its clients.

FCADV may provide to its advisory and financial planning clients advice or recommendations specific to insurance services or products. Clients should be aware that neither FCADV nor its representatives receives commissions or transaction fees in connection with the sale or purchase of insurance products. In keeping with FCADV's fee-only model, the client may pay an ongoing Advisory fee for insurance strategy, implementation, and review. Clients are in no way required to purchase such services or products and are free to obtain such services or products from sources outside of FCADV, its representatives, and/or affiliates.

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

A. CODE OF ETHICS

FCADV has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

B. RECOMMENDATIONS INVOLVING MATERIAL FINANCIAL INTERESTS

FCADV does not recommend that clients buy or sell any security in which a related person to FCADV or FCADV has a material financial interest.

C. INVESTING PERSONAL MONEY IN THE SAME SECURITIES AS CLIENTS

From time to time, representatives of FCADV may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of FCADV to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. FCADV will always document any transactions that could be constructed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. TRADING SECURITIES AT/AROUND THE SAME TIME AS CLIENT'S SECURITIES

From time to time, representatives of FCADV may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of FCADV to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. FCADV will always document any transactions that could be constructed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Item 12: Brokerage Practices

A. FACTORS USED TO SELECT CUSTODIANS AND/OR BROKER/DEALERS

FCADV does not maintain physical custody of client assets, although we may be deemed to have custody if given authority to withdraw assets from clients' accounts (see Item 15 – Custody, below). Client assets must be maintained in an account at a 'qualified custodian,' generally a broker-dealer or bank.

FCADV considerations in recommending specific custodians/broker-dealers are based on a number of factors including but not limited to the historical business relationship of each with the partners of FCADV and the financial strength, reputation, execution capability, pricing, research and services, relatively low transaction and commission fees and reporting ability of each. The selected custodian will provide/provides various products and services that assist FCADV in managing and administering client accounts, such as software and technology that (i) provide access to client account data (such as trade

confirmation and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate the payment of the advisory fees from its client accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Custodians/broker-dealers will be recommended based on FCADV's duty to seek "best execution", which is the obligation to seek to execute securities transactions for a client on terms that are the most favorable to the client under the circumstances. The client will not necessarily pay the lowest commission or commission equivalent, and FCADV may also consider the market expertise and research access to provide by the payment of commissions, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers to aid in the research efforts of FCADV. FCADV will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Generally, the broker-dealer affiliated with the client's custodian also acts as the executing firm in connection with transactions in the client's account. Prior to engaging FCADV to provide investment advisory services, the client will be required to enter into a formal Investment Advisory Agreement with FCADV setting forth terms and conditions under which the client's assets shall be managed, and a separate custodial agreement with the broker-dealer custodian. FCADV generally recommends that clients use Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer, member SIPC, as the qualified custodian. FCADV is independently owned and operated and not affiliated with Schwab. Clients establish brokerage account(s) with Schwab by entering into an account agreement directly with them. FCADV does not open the account but will assist clients in doing so. Schwab will hold client assets in a brokerage account and will affect investment transactions for the accounts when instructed by FCADV.

SERVICES BY SCHWAB

Schwab Advisor Services™ (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms, like FCADV. Through Schwab Advisor Services™, Schwab provides FCADV and its clients, including those enrolled in FCADV AIP, with access to its institutional brokerage services – trading, custody, reporting, and related services – many of which are not typically available to Schwab retail customers.

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 the client and the client's account. The availability of Schwab products and services to FCADV is not based on us giving particular investment advice, such as buying particular securities for our clients.

While FCADV endeavors to act in the best interest of its clients, recommending that clients maintain their assets in accounts at Schwab may be based in part on the benefit to the Adviser or the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab. This may create a potential conflict of interest. FCADV receives no referrals in exchange for using the services of Schwab.

Research and Other Soft Dollar Benefits

While FCADV has no formal soft dollars program in which soft dollars are used to pay for third party services, FCADV may receive research, products, or other services from broker/dealers, such as those detailed above under *Services by Schwab*, in connection with client securities transactions ("soft dollar benefits") consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended, and may consider these benefits in recommending brokers. There can be no assurance that any particular client will benefit from any particular soft dollar research or other benefits. FCADV benefits by not having to produce or pay for the research, products or services, and FCADV will have an incentive to recommend a broker/dealer based on receiving research or services.

Brokerage for Client Referrals

FCADV receives no referrals, compensation, or revenue from any broker-dealer or third party in exchange for using that broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

FCADV will recommend clients use a specific broker-dealer, generally Schwab, to execute transactions.

FCADV seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of FCADV's economic, investment or other financial interests. To meet its fiduciary obligations, FCADV attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and, accordingly, FCADV's policy is to seek fair and equitable allocation of investment opportunities/transactions among its client to avoid favoring one client over another over time. It is FCADV's policy to allocation investment opportunities and transactions it identifies as being appropriate and prudent that might have a limited supply, among its clients on a fair and equitable basis over time.

Clients reserve the right to select their own custodian, however, Clients are informed that when selecting to use an independent custodian other than the custodian suggested by FCADV:

- FCADV may not be able to negotiate the best commission rates
- if requested Client will send a copy of the Custodian agreement to FCADV

- FCADV shall not maintain physical custody of Client Assets, rather Client Assets will be held in the custody of a Custodian meeting the requirements of a “qualified Custodian” under Rule 206(4)-2 of the Advisors Act
- FCADV is authorized to give instructions to the Custodian with respect to all investment decisions regarding the Assets, and the Custodian is hereby authorized and directed to effect transactions, deliver securities, make payments and otherwise take such actions as FCADV shall direct in connection with the performance of obligations with respect to the Assets
- fees charged to Client by the Custodian are exclusive of, and in addition to, the Advisor Compensation and other charges discussed herein.

B. AGGREGATING (BLOCK) TRADING FOR MULTIPLE CLIENT ACCOUNTS

If FCADV buys or sells the same securities on behalf of more than one client, it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple clients in order to seek more favorable process, lower brokerage commissions or more efficient execution. In such case, FCADV would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. FCADV would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with FCADV’s duty to seek best execution, except for those accounts with specific brokerage directions (if any).

Item 13: Reviews of Accounts

A. FREQUENCY AND NATURE OF PERIODIC REVIEWS AND WHO MAKES THOSE REVIEWS

FCADV’s Investment Adviser Representatives review client financial plans at least annually with regard to each client’s respective investment policies and risk tolerance levels.

B. FACTORS THAT WILL TRIGGER A NON-PERIODIC REVIEW OF CLIENT ACCOUNTS

Financial plan reviews may be triggered by material market, economic or political events, or by changes in clients’ financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. CONTENT AND FREQUENCY OF REGULAR REPORTS PROVIDED TO CLIENTS

Each advisory client will receive at least quarterly from the custodian a written report that details the client’s account including assets held and asset value. Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. ECONOMIC BENEFITS PROVIDED BY THIRD PARTIES FOR ADVICE RENDERED TO CLIENTS (INCLUDES SALES AWARDS OR OTHER PRIZES)

FCADV receives an economic benefit from Schwab in the form of the support products and services it makes available to us. These products and services, how they benefit us, and the related conflicts of interest are described above under *Item 12 Brokerage Practices*. The availability of Schwab’s products and services to FCADV is not based on us giving particular investment advice, such as buying securities for our clients.

B. COMPENSATION TO NON-ADVISORY PERSONNEL FOR CLIENT REFERRALS

FCADV engages independents solicitors to provide client referrals. If a client is referred to FCADV by a solicitor, this practice is disclosed to the client in writing by the solicitor and FCADV pays the solicitor out of its own funds – specifically, FCADV generally pays the solicitor a portion of the advisory fee earned for managing the capital of the client or investor that was referred. The use of solicitors is strictly regulated under applicable federal and state law. FCADV’s policy is to fully comply with the requirements of Rule 206(4)-3, under the Investment Advisers Act of 1940, as amended, and similar state rules as applicable.

FCADV may receive client referrals from Zoe Financial, Inc through its participation in Zoe Advisor Network (ZAN). Zoe Financial, Inc. is independent of and unaffiliated with FCADV and there is no employee relationship between them. Zoe Financial established the Zoe Advisor Network as a means of referring individuals and other investors seeking fiduciary personal investment management services or financial planning services to independent investment advisors. Zoe Financial does not supervise FCADV and has no responsibility for FCADV’s management of client portfolios or FCADV’s other advice or services. FCADV pays Zoe Financial an on-going fee for each successful client referral. This fee is usually a percentage of the advisory fee that the client pays to FCADV (“Solicitation Fee”). FCADV will not charge clients referred through Zoe Advisor Network any fees or costs higher than its standard fee schedule offered to FCADV’s clients. For information regarding additional or other fees paid directly or indirectly to Zoe Financial Inc., please refer to the Zoe Financial Disclosure and Acknowledgement Form.

Item 15: Custody

Clients receive account statements directly from a qualified custodian, at least quarterly, via email or postal mailing address as instructed by the client. The statements will reflect all securities held with their custodian as well as any transactions that occurred in the account, including the deduction of investment management fees. Clients should review the account statements received from their custodian and should compare them to any reports they received from FCADV. Clients can contact FCADV at the address or phone number on the cover of this brochure with any questions about their statements and reports.

Item 16: Investment Discretion

FCADV provides discretionary investment advisory services to clients. The Investment Advisory Agreement established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, FCADV generally manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share. In some instances, FCADV's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to FCADV.)

Item 17: Voting Client Securities (Proxy Voting)

FCADV will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. BALANCE SHEET

FCADV neither requires nor solicits prepayment of more than \$ 1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. FINANCIAL CONDITIONS REASONABLY LIKELY TO IMPAIR ABILITY TO MEET CONTRACTUAL COMMITMENTS TO CLIENTS

Neither FCADV nor its management has any financial condition that is likely to reasonably impair FCADV's ability to meet contractual commitments to clients.

C. BANKRUPTCY PETITIONS IN PREVIOUS TEN YEARS

FCADV has not been the subject of a bankruptcy petition in the last ten (10) years.