# Firm Brochure

(Part 2A of Form ADV)



Financial Planning Center, LLP 662 Sango Road, Suite A Clarksville, TN 37043

PHONE: 931-358-3961

FAX: 931-358-3956

WEBSITE: www.ClarksvilleFPC.com EMAIL: info@ClarksvilleFPC.com

This brochure provides information about the qualifications and business practices of Financial Planning Center, LLP. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 931-358-3961 or by email at info@ClarksvilleFPC.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Financial Planning Center, LLP (IARD#143829) is available on the SEC's website at www.adviserinfo.sec.gov

January 21, 2016

# **Item 2: Material Changes**

### **Annual Update**

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

# **Material Changes since the Last Update**

This update is in accordance with the required annual update for Registered Investment Advisors. Since the last update on September 24, 2015, the following changes have occurred:

• Item 10 the account minimum for Gradient Investments, LLC was updated.

#### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at 931-358-3961or by email at info@ClarksvilleFPC.com.

# **Item 3: Table of Contents**

## Form ADV - Part 2A - Firm Brochure

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# **Item 4: Advisory Business**

#### Firm Description

Financial Planning Center, LLP, ("FPC") was founded in 2007. FPC is owned and operated by Partners Wayne R. Arnold and Nicholas H. Meriwether.

FPC provides personalized confidential financial planning and and solicits for third party investment managers to individuals. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

FPC is a fee based financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm's Partners are affiliated with entities that sell insurance products.

Investment advice is provided, with the client making the final decision on investment selection. FPC does not act as a custodian of client assets.

An evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement or risk analysis. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the event they should occur.

#### **Types of Advisory Services**

FPC furnishes financial planning and investment advice through consultations.

#### FINANCIAL PLANNING AND CONSULTING

If financial planning services are applicable, the client will compensate FPC on a negotiable fixed fee or an hourly fee basis described in detail under "Fees and Compensation" section of this brochure. Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance. If a conflict of interest exists between the interests of the investment advisor and the interests of the client, the client is under no obligation to act upon the investment advisor's recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through FPC. Financial plans will be completed and delivered inside of six (6) months. Clients may terminate advisory services with thirty (30) days written notice.

#### **SOLICITOR ARRANGEMENTS**

FPC solicits the services of Third Party Money Managers to manage client accounts. In such circumstances, FPC receives solicitor fees from the Third Party Manager. This is detailed in Item 10 of this brochure.

#### **Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

#### **Wrap Fee Programs**

FPC does not participate in wrap fee programs.

#### **Client Assets under Management**

FPC does not manage client assets.

## **Item 5: Fees and Compensation**

## **Method of Compensation and Fee Schedule**

FPC bases its fees on hourly charges, fixed fees and solicitor fees from third party money managers.

#### FINANCIAL PLANNING and CONSULTING

Prior to the planning process the client will be provided an estimated plan fee. Client will pay nothing to start with the balance payable after ninety (90) days. Client may cancel at any time during the ninety (90) days with no cost or obligation. Services are completed and delivered inside of ninety (90) days.

#### **FIXED FEES**

Financial Planning Services are offered based on a negotiable fixed fee with a maximum fee of \$2,500 based on complexity and unique client needs.

#### **HOURLY FEES**

Financial Planning Services are offered based on an hourly fee of \$200 per hour.

#### **SOLICITOR FEES**

FPC at times will utilize the services of Third Party Money Managers and receive a solicitor fee for soliciting clients. FPC will be paid a portion of the advisory fee paid to the third party money manager. The client will not pay additional advisory fees to the third party money manager for these services. This is detailed in Item 10 of this brochure.

#### **Client Payment of Fees**

Fees for financial plans are due upon delivery of the financial plan.

## **Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities and exchange-traded funds. These charges may include Mutual Fund transactions fees, postage and handling and miscellaneous fees (fee levied to recover costs associated with fees assessed by self regulatory organizations). The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

For more details on the brokerage practices, see Item 12 of this brochure.

#### **Prepayment of Client Fees**

FPC does not bill clients in advance.

#### **External Compensation for the Sale of Securities to Clients**

FPC does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of FPC.

#### **Item 6: Performance-Based Fees**

#### **Sharing of Capital Gains**

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

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

# **Item 7: Types of Clients**

#### **Description**

FPC generally provides investment advice to individuals.

Client relationships vary in scope and length of service.

#### **Account Minimums**

FPC does not require a minimum to open an account.

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

#### **Methods of Analysis**

Security analysis methods used by Third Party Money Managers may include fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns.

When creating a financial plan, FPC utilizes fundamental analysis to provide review of insurance policies for economic value and income replacement. Technical analysis is used to review mutual funds and individual stocks. The main sources of information include Morningstar, client documents such as tax returns and insurance policies.

In developing a financial plan for a client, FPC's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the client's specific situation.

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

#### **Investment Strategy**

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

an Investment Policy Statement or Risk Tolerance that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

#### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with FPC:

The specific risks associated with financial planning include:

- Risk of Loss
  - Client fails to follow the recommendations of FPC resulting in market loss
  - Client has changes in financial status or lifestyle and therefore plan recommendations are no longer valid

The risks associated with utilizing Third Party Money Managers ("TPM") include:

- Manager Risk
  - o the TPM fails to execute the stated investment strategy
- Business Risk
  - o TPM has financial or regulatory problems
- The specific risks associated with the portfolios of the TPM's which is disclosed in the TPM's Form ADV Part 2.

# **Item 9: Disciplinary Information**

#### **Criminal or Civil Actions**

The firm and its management have not been involved in any criminal or civil action.

#### **Administrative Enforcement Proceedings**

The firm and its management have not been involved in administrative enforcement proceedings.

#### **Self Regulatory Organization Enforcement Proceedings**

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

# Item 10: Other Financial Industry Activities and Affiliations

#### **Broker-Dealer or Representative Registration**

Neither FPC nor any of its employees are registered representatives of a broker-dealer.

#### **Futures or Commodity Registration**

Neither FPC nor its employees are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

#### Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Partners Wayne Arnold and Nicholas Meriwether have financial affiliated businesses as licensed insurance agents. From time to time, they offer clients advice or products from those activities.

These practices represent conflicts of interest because it gives them an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that Mr. Arnold and Mr. Meriwether have a fiduciary responsibility to place the interest of the client first and the clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

#### Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

FPC may at times utilize the services of Third Party Money Managers to manage client accounts. In such circumstances, FPC will share in the Third Party asset management fee. This situation creates a conflict of interest. However, when referring clients to a third party money manager, the client's best interest will be the main determining factor of FPC. These fees do not include brokerage fees that may be assessed by the custodial broker dealer. Fees for these services will be based on a percentage of assets under management not to exceed any limit imposed by any regulatory agency. The final fee schedule will be attached to Exhibit D in FPC's Investment Advisory Agreement.

#### **SOLICITOR FEES**

FPC has entered into a Solicitor Agreement with Gradient Investments, LLC ("GI"). GI is a Registered Investment Advisor that provides investment portfolio advice and supervisory services.

The relationship between FPC and the Third Party Money Manager will be disclosed to the client in writing prior to commencement of the services. FPC does not charge additional management fees for Third Party managed account services. Client's signature is required to confirm consent for services within Third Party Investment Agreement. Client will initial FPC's Investment Advisory Agreement to acknowledge receipt of Third Party fee Schedule and required documents including Form ADV Part 2 disclosures.

#### Gradient Investments, LLC ("GI")

GI offers an actively managed program of mutual fund and stock portfolios. GI's minimum account value required is \$100,000. The fee will be disclosed to the client in the Investment Advisory Agreement and is negotiable. The client fee for these services will be based on a percentage of assets under management as follows:

Fee Schedule for:			
Gradient 50	Gradient 50 Managed Stock Gradient 33 Growth Portfolio		th Portfolio
Covered Call Portfolio Controlled Volatility Portfolio		ty Portfolio	
Gradient Tactical Rotation			
Assets Valuation	Annual Fee	GI Retention	FPC Retention
\$100,000 - \$1,000,000	2.00%	1.00%	1.00%
Next \$1,000,000	1.65%	.80%	.85%
Next \$1,000,000	1.20%	.60%	.60%
Over \$3,000,000	.95%	.45%	.50%

Fee Schedule For:				
Laddered Income Fund Endowment Series (		t Series (ETF)		
Absolute Yield Fixed Income		me Precious Me	Precious Metals Portfolio	
Assets Valuation	Annual Fee	GI Retention	FPC Retention	
\$100,000 - \$1,000,000	1.70%	.70%	1.00%	
Next \$1,000,000	1.35%	.60%	.75%	
Next \$1,000,000	1.00%	.50%	.50%	
Over \$3,000,000	.80%	.40%	.40%	

Fee Schedule for			
Non-Discretionary/Non-Managed Accounts*			
Assets Valuation	Annual Fee	GI Retention	FPC Retention
All non-managed assets	.60%	.30%	.30%

<sup>\*</sup>The minimum quarterly fee billed will be \$25

This relationship will be disclosed to the client in each contract between FPC and Third Party Money Manager. FPC does not charge additional management fees for Third Party managed account services. Client's signature is required to confirm consent for services within Third Party Investment Agreement. Client will initial FPC's Investment Advisory Agreement to acknowledge receipt of Third Party fee Schedule and required documents including ADV Part 2 disclosures.

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

#### **Code of Ethics Description**

The employees of FPC have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of FPC employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of FPC. The Code reflects FPC and its supervised persons' responsibility to act in the best interest of their client.

One area which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

FPC's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of FPC may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

FPC's Code is based on the guiding principle that the interests of the client are our top priority. FPC's officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

# Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

FPC and its employees do not recommend to clients securities in which we have a material financial interest.

# Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

FPC and its employees may buy or sell securities that are also held by clients. In order to mitigate potential conflicts of interest such as heading away of client trades, employees are required to disclose all reportable securities transactions as well as provide FPC with copies of their brokerage statements.

The Chief Compliance Officer of FPC is Wayne Arnold. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

# Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

FPC does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide FPC with copies of their brokerage statements.

The Chief Compliance Officer of FPC is Wayne Arnold. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not

affect the markets and that clients of the firm receive preferential treatment over employee transactions.

# **Item 12: Brokerage Practices**

#### **Factors Used to Select Broker-Dealers for Client Transactions**

Advisor does not select broker-dealers for client transactions.

- Directed Brokerage
  - FPC utilizes Third Party Money Managers and therefore it does not take direction from clients as to what broker-dealer to use.
- Best Execution
  - Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. FPC does not exercise discretion of client accounts.
- Soft Dollar Arrangements
  FPC does not have any soft dollar arrangements.

# **Aggregating Securities Transactions for Client Accounts**

FPC does not trade for its or its clients accounts and therefore aggregation of securities transactions is not applicable.

#### **Item 13: Review of Accounts**

#### Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by advisors Wayne Arnold and Nicholas Meriwether. Account reviews are performed more frequently when market conditions dictate. Financial Plans are considered complete when recommendations are delivered to the client and a review is done only upon request of client.

#### **Review of Client Accounts on Non-Periodic Basis**

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

#### **Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the Third Party Money Manager's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

# **Item 14: Client Referrals and Other Compensation**

# Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

FPC receives a portion of the annual management fees collected by the Third Party Money Managers to whom FPC refers clients. In addition, financial consultants may be eligible for cash and non-cash compensation including bonuses, recognition trips and other benefits. Some of these programs may be financed in whole or in part by unaffiliated third parties, including third party money managers, which may influence some representatives to favor those managers. See the prior sections entitled "Fees and Compensation" and "Other Financial Industry Activities and Affiliations" for more details regarding compensation and conflicts of interests.

This situation creates a conflict of interest because FPC and/or its Investment Advisor Representative have an incentive to decide what Third Party Money Managers to use because of the higher solicitor fees to be received by FPC. However, when referring clients to a third party money manager, the client's best interest will be the main determining factor of FPC.

#### **Advisory Firm Payments for Client Referrals**

FPC does not compensate for client referrals.

# **Item 15: Custody**

#### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the performance report statements prepared by Third Party Money Managers.

FPC is deemed to have constructive custody solely because advisory fees are directly deducted from client's account by the custodian on behalf of FPC.

#### **Item 16: Investment Discretion**

# **Discretionary Authority for Trading**

FPC does not have discretionary authority.

# **Item 17: Voting Client Securities**

#### **Proxy Votes**

FPC does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

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

#### **Item 18: Financial Information**

#### **Balance Sheet**

A balance sheet is not required to be provided because FPC does not serve as a custodian for client funds or securities and FPC does not require prepayment of fees of more than \$500 per client and six months or more in advance.

# Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

FPC has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

## **Bankruptcy Petitions during the Past Ten Years**

Neither FPC nor any affiliated person has any bankruptcies to report within the last ten years.

#### **Item 19: Requirements for State Registered Advisors**

Education and business background, including any outside business activities for all management and supervised persons can be found in the Supplement to this Brochure (Part 2B of Form ADV Part 2).

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

None to report

# Supervised Person Brochure

Part 2B of Form ADV

# Wayne Arnold, ChFC

Financial Planning Center, LLP 662 Sango Road, Suite A Clarksville, TN 37043

PHONE: 931-358-3961

FAX: 931-358-3956

WEBSITE: www.ClarksvilleFPC.com EMAIL: info@ClarksvilleFPC.com

This brochure supplement provides information about Wayne Arnold that supplements the Financial Planning Center, LLP's brochure. You should have received a copy of that brochure. Please contact Wayne Arnold if you did not receive Financial Planning Center, LLP's brochure or if you have any questions about the contents of this supplement.

Additional information about Wayne Arnold (IARD#2219814) is available on the SEC's website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>.

#### **DRAFT**

# **Brochure Supplement (Part 2B of Form ADV) Supervised Person Brochure**

# **Principal Executive Officers and Management Persons**

#### Wayne Arnold ChFC®

• Year of birth: 1962

## **Educational Background and Business Experience**

**Educational Background:** 

- University of Wisconsin; Bachelor of Arts; 1984
- The American College; ChFC®

#### **Business Experience:**

- Financial Planning Center, LLP; Partner/Chief Compliance Officer; 03/2007-Present
- A&M Brokerage, LLP; Partner; 12/1991-Present
- Evolve Securities, Inc.; Mass Transfer; 05/2006-11/2007
- US Worldwide Financial Services; Registered Rep; 03/2000-04/2006

#### **Professional Certifications**

Employees have earned certifications and credentials that are required to be explained in further detail.

<u>Chartered Financial Consultant (ChFC)</u>: Chartered Financial Consultants are licensed by the American College to use the ChFC mark. ChFC certification requirements:

- Complete ChFC coursework within five years from the date of initial enrollment
- Pass the exams for all required elective courses. You must achieve a minimum score of 70% to pass.
- Meet the experience requirements: Three years of business experience immediately preceding the date of use of the designation are required. An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience.
- Take the Professional Ethics Pledge.
- When you achieve your ChFC designation, you must earn your recertification every two years.

#### **Disciplinary Information**

None to report

#### Other Business Activities

Wayne Arnold has a financial industry affiliated business as an insurance agent. From time to time, he offers clients advice or products from those activities. Clients are not required to purchase any products.

This practice represents a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that Mr. Arnold has a fiduciary responsibility to place the interest of the client first and the clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

## **Additional Compensation**

Mr. Arnold receives additional compensation in his capacity as an insurance agent, but he does not receive any performance based fees

#### **Supervision**

As part owner of FPC, Mr. Arnold is supervised by his business partner Nicholas Meriwether. He will adhere to the policies and procedures as described in the firm's Compliance Manual.

#### **Requirements for State-Registered Advisors**

Arbitration Claims: None to report.

Self-Regulatory Organization or Administrative Proceeding: None to report.

*Bankruptcy Petition:* Wayne Arnold has no bankruptcies to report within the last ten years.

# Supervised Person Brochure Part 2B of Form ADV

Nicholas Meriwether, ChFC

# Financial Planning Center, LLP 662 Sango Road, Suite A Clarksville, TN 37043

PHONE: 931-358-3961 FAX: 931-358-3956

WEBSITE: www.ClarksvilleFPC.com EMAIL: info@ClarksvilleFPC.com

This brochure supplement provides information about Nicholas Meriwether that supplements the Financial Planning Center, LLP's brochure. You should have received a copy of that brochure. Please contact Nicholas Meriwether if you did not receive Financial Planning Center, LLP's brochure or if you have any questions about the contents of this supplement.

Additional information about Nicholas Meriwether (IARD#2662817) is available on the SEC's website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>.

January 21, 2016

#### **Principal Executive Officers and Management Persons**

#### Nicholas Meriwether, ChFC®

• Year of birth: 1960

# **Educational Background and Business Experience**

#### **Educational Background:**

• The American College; ChFC®

#### **Business Experience:**

- Financial Planning Center, LLP; Partner/Financial Planner; 01/2008-Present
- A&M Brokerage, LLP; Partner; 12/2007-Present
- Self Employed; Insurance Agent; 01/1980-Present
- Evolve Securities, Inc.; Mass Transfer; 05/2006-11/2007

#### **Professional Certifications**

Employees have earned certifications and credentials that are required to be explained in further detail.

<u>Chartered Financial Consultant (ChFC)</u>: Chartered Financial Consultants are licensed by the American College to use the ChFC mark. ChFC certification requirements:

- Complete ChFC coursework within five years from the date of initial enrollment
- Pass the exams for all required elective courses. You must achieve a minimum score of 70% to pass.
- Meet the experience requirements: Three years of business experience immediately preceding the date of use of the designation are required. An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience.
- Take the Professional Ethics Pledge.
- When you achieve your ChFC designation, you must earn your recertification every two years.

#### **Disciplinary Information**

None to report

#### **Other Business Activities**

Nicholas Meriwether has a financial industry affiliated business as an insurance agent. From time to time, he offers clients advice or products from those activities. Clients are not required to purchase any products.

This practice represents a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that Mr. Meriwether has a fiduciary responsibility to place the interest of the client first and the clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

## **Additional Compensation**

Mr. Meriwether receives additional compensation in his capacity as an insurance agent, but he does not receive any performance based fees.

# **Supervision**

As part owner of FPC, Mr. Meriwether is supervised by his business partner, Wayne Arnold. He will adhere to the policies and procedures as described in the firm's Compliance Manual.

# **Requirements for State-Registered Advisors**

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None