

# Form ADV Part 2A Brochure

Fidelis Financial Planning, LLC

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**March 19, 2016**

This Brochure provides information about the qualifications and business practices of Fidelis Financial Planning, LLC. If you have any questions about the contents of this Brochure, please contact us at 636-922-9252 or [www.fidelisfp.com](http://www.fidelisfp.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.

Fidelis Financial Planning, LLC is a Missouri registered investment adviser. Registration as an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information from which you can determine whether to hire or retain the adviser.

Additional information about Fidelis Financial Planning, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes

This Brochure dated March 19, 2016, represents the annual amendment of the Form ADV Part 2 Brochure for Fidelis Financial Planning, LLC.

Since the firm's last Brochure dated March 31, 2015, we have made updates to reflect Jeffrey Laughlin purchasing ownership interest from Jack White, the firm's founder. We have also made various minor updates to the Brochure, but no other material changes were made.

Pursuant to regulatory requirements, we will deliver to you a summary of any material changes to this and subsequent Brochures within 120 days of the close of our fiscal year if any material changes were made. We may further provide other ongoing disclosure information about material changes as necessary. All such information will be provided to you free of charge.

Currently, our Brochure may be requested by contacting Jack D. White, Chief Compliance Officer, Fidelis Financial Planning, LLC at 636-922-9252 or [jwhite@fidelisfp.com](mailto:jwhite@fidelisfp.com). Our Brochure is also available on our web site [www.fidelisfp.com](http://www.fidelisfp.com), also free of charge.

Additional information about Fidelis Financial Planning, LLC is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with Fidelis Financial Planning, LLC who are registered, or are required to be registered, as investment advisory representatives of Fidelis Financial Planning, LLC.

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## **Item 4 – Advisory Business**

Fidelis Financial Planning, LLC (CRD#141698) (“Fidelis”) is a Missouri registered investment adviser. Fidelis is based in and organized as a limited liability company under the laws of the state of Missouri. The firm was formed in 2006 and currently has three employees. Jack D. White, CFP® founded Fidelis and is the firm’s Chief Compliance Officer. Jeffrey Laughlin owns the firm and is the firm’s President.

Fidelis Financial Planning, LLC is located at 42 Portwest Court, St. Charles, MO 63303. Regular business hours are from 9:00 AM through 5:00 PM Monday through Friday. The firm can be contacted by phone at (636) 922-9252 or by fax at (314) 754-9165. The firm also has a location at 1034 S. Brentwood Blvd., Suite 2110, St. Louis, MO 63117.

Fidelis assists clients in building and preserving the wealth necessary to accomplish their life goals by offering both financial planning and investment management services.

### **Financial Planning Services**

Fidelis considers financial planning to be a critical component of a client’s financial success. Our financial planning process utilizes the 6 Step Financial Planning Process as defined by the CFP® Financial Planning Practice Standards as a guide to create a client’s personal *Financial Goal Plan*. Fidelis provides individualized advice which is tailored to a client’s individual needs and designed to assist them in securing their long-term financial well being.

During the course of preparation of a client’s personal Financial Goal Plan (Steps 3 & 4 of the 6 Step Financial Planning Process), Fidelis planners analyze the client’s current portfolio in conjunction with their risk tolerance questionnaire, planning goals, insurance needs, tax bracket retirement income and estate planning needs. This analysis allows Fidelis planners to recommend an investment plan that is consistent with the client’s planning goals and income needs. Subsequently, Fidelis planners prepare an Investment Policy Statement (IPS) that outlines potential risk and return of the proposed investment plan as well as outlines applicable fees and rebalancing methodologies for the proposed investment plan.

Clients have full discretion as to whether to accept recommendations made by Fidelis, and as to whether to retain Fidelis to assist with implementation of recommendations or with investment management services.

### **Investment Management Services**

Fidelis provides some investment management services directly and some through an outside provider.

When providing services directly, Fidelis not only makes recommendations related to investments, but also implements these recommendations and provides ongoing monitoring and reporting. Recommendations made by Fidelis are based on the IPS developed during the financial planning process. Clients may elect to give the firm discretion to make all decisions (discretionary

management), or may prefer to approve all decisions before implementation (non discretionary management).

Fidelis also makes investment management services available through an independent third party administrator, LWI Financial, Inc. ("Loring Ward"). Loring Ward is registered as an investment adviser with the Securities and Exchange Commission, and securities may be offered through its affiliate, Loring Ward Securities, Inc. a registered broker dealer and FINRA/SIPC member firm.

Loring Ward provides certain implementation services for Fidelis and its clients such as account administration, portfolio allocation analysis, asset-class investment strategizing, back-office fulfillment, report and statement production, and fee debiting, while Fidelis is responsible for developing the client's IPS and overall investment plan. Clients contract directly with both Fidelis and Loring Ward, and services provided by Loring Ward are paid directly through fees billed to the client by Loring Ward or are paid indirectly to Loring Ward through mutual fund administration fees.

Before providing services through Loring Ward, Fidelis will provide a proposal in advance detailing the investment program recommended, the specific fees to be charged, and the manner in which Loring Ward will be compensated. In addition to their standard program, the "Structured Investing Portfolio" program whereby Loring Ward receives indirect compensation, Loring Ward also offers their "Structured Investing Advantage" program tailored for larger accounts, and for these accounts Loring Ward is compensated directly.

Details about Loring Ward, their fees, their business practices, etc., are available in their Form ADV Part 2A Brochure, which is available upon request directly from them, is available from Fidelis, or is available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

In addition to the services that Fidelis and Loring Ward provide to clients, Fidelis also contracts with Loring Ward to obtain access to certain of Loring Ward's proprietary software designed to assist in assessing the client's financial status, investment goals, risk tolerance, income, liquidity requirements and investment time horizon. Loring Ward also assists Fidelis in developing portfolio asset allocation recommendations and developing investment programs for clients.

Loring Ward assists Fidelis in the operational duties of the *Structured Investing* accounts by:

- a. accepting verbal and/or written instructions from Fidelis planners to direct investments into asset allocations of any and all securities within the client's *Structured Investing* accounts as authorized by the client in the client's account agreement, together with authorizing the periodic rebalancing to original target asset allocations;
- b. provide periodic performance reports, rebalancing reports, year-end supplemental tax information for taxable accounts, and maintain, or cause to be maintained, records of account assets including all purchases, redemptions, sales and exchanges; and
- c. account billing, payment and reporting services.

Loring Ward may also sponsor educational seminars for the benefit of Fidelis Financial Planning, LLC and its clients. Such educational seminars provide Fidelis with access to information and ideas regarding practice development, client servicing, investment strategy, relationship management and financial planning. Attendance expenses associated with such educational seminars may be paid or reimbursed, either in whole or in part, by Loring Ward.

## Item 5 – Fees and Compensation

Fidelis Financial Planning, LLC provides financial planning services both on a stand-alone or project basis, and provides integrated financial planning/investment management services.

### **Integrated Financial Planning/Investment Management Service**

This service is in most cases a 2 step process:

**Step 1.** Generally, we begin the planning engagement by creating a *personal financial goal plan* (Plan) for each client. The cost of the Plan is determined by the number of hours anticipated to complete it. The Fidelis planner will estimate the maximum fee prior to the engagement based on a rate of \$200 per hour. For most engagements, a minimum Plan fee is \$2,000. Exceptions may or may not be made to this minimum fee for the Plan if the circumstances of the engagement deem it prudent, i.e., a less than complete analysis of the client's circumstances, hardship exception, etc.

**Step 2.** Step 2. Once the Plan is completed and accepted by the client, the client may choose to have Fidelis implement the Plan. There is no minimum of assets to be invested but Fidelis does have a minimum fee of \$3,000 per year for our complete financial goal planning services. Exceptions may, or may not be made to this minimum plan if the circumstances of the engagement deem it prudent, i.e., a less than complete analysis of the client's circumstances, a hardship exception, etc. Depending on the amount of assets to be invested with Fidelis, (in most cases \$300,000 and up), there may be a reduction in the first year's fees to compensate the client for the initial cost of the Plan. The on-going fees are calculated as a percentage of assets under management (AUM) and include unlimited financial planning advice and portfolio management.

#### **AUM fee schedule:**

- up to \$999,999.99                      1 %
- \$1,000,000 to \$1,999,999.99    0.9%
- above \$2,000,000 is negotiable

The annual fees quoted above apply to the total value of all accounts managed by Fidelis. (For example, if a client has an IRA worth \$800,000 and a taxable account worth \$225,000, the annual fee would be 0.90% based on the total value of \$1,025,000.)

### **Financial Planning Review Service**

Occasionally clients create a personal financial goal Plan with Fidelis yet they prefer to implement the Plan on their own or wait a period of years before implementing it. In such cases,

the client may want a periodic review and update of the Plan as it relates to their on-going circumstances and financial situation. The review rate is \$200 per hour with a minimum of \$500 based on 1 hour of preparation plus 1.5 hours to review the plan with the client. The client will be given a fee proposal with estimated maximum cost before they begin.

## **Financial Planning Consulting Service**

Fidelis also offers general financial planning consultation on a stand-alone basis at \$200 per hour. The client will be given a proposal with estimated maximum cost of the engagement before they begin and the minimum for this service is \$500.00. The consulting service may include financial planning, general planning advice or a targeted financial plan, review of client's financial situation, or related matters as they request, including in-person or telephone consultations.

### **All fees quoted above are subject to negotiation.**

The specific manner in which fees are charged by Fidelis Financial Planning, LLC is detailed in a client's written agreement with Fidelis and may vary depending on circumstances.

Clients who have chosen Fidelis to implement their Plan are generally billed on a quarterly basis. Clients may also elect to be billed directly for fees or to authorize Fidelis to directly debit fees from client accounts. Management fees are prorated for each capital contribution and withdrawal is made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Fidelis Financial Planning fees are separate from transaction fees, and other related costs and expenses which are incurred by the client. Clients may incur certain charges imposed by custodians, third party investment managers, and other third party providers. These charges may include management fees, administrative fees, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to Fidelis' fee, and Fidelis will not receive any portion of these commissions, fees, and costs.

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

Fidelis Financial Planning, LLC does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client), and consequently does not simultaneously manage performance based and non performance based accounts.

## **Item 7 – Types of Clients**

Fidelis Financial Planning, LLC provides integrated financial planning services and portfolio management services to middle income and high net worth individuals, corporate pension and profit-sharing plans, charitable institutions, private investment funds, trust programs, corporations and other business entities.

Although Fidelis does not require a minimum account size, minimum fees (as detailed in Item 5 above) may apply. The firm may however waive minimum fee requirements in certain instances (e.g. family accounts, charitable accounts, etc.)

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

Fidelis Financial Planning, LLC's *Structured Investing* philosophy offers what we consider to be a prudent, strategic approach designed to help investors achieve their lifetime financial goals. The approach is based not only on academic research in areas of market history, investor psychology and investor behavior, but is also based on decades of empirical evidence and practical applications of investor and market theory.

Fidelis believes there are five key concepts that play an essential role in the construction of a portfolio tailored specifically to each investor's goals.

1. Market Efficiency – We believe in taking advantage of market efficiency through broad based market investing.
2. Correlation of Risk & Return – We believe in the 3 Factor Model of Eugene Fama & Ken French, as well as other investment evaluation tools.

3. Risk Reduction through Diversification – We believe that although risk can't be eliminated entirely, it can be mitigated through a prudent, structured diversification approach.
4. Portfolio Optimization – We believe in customizing your Portfolio to reach your investment goals rather than a “one size fits all” approach.
5. Long Term, Strategic Investing – We believe in investing using a long term, strategic approach rather than a short term, tactical approach, and in rebalancing periodically to keep the portfolio aligned with investor goals.

In designing our client portfolios, we are free to choose from among thousands of mutual funds, but we generally prefer passively managed and index funds with low expense ratios because we believe they offer the best value to our clients. We often recommend the family of funds managed by Dimensional Fund Advisors, Inc. (“DFA”), an institutional investment manager who we feel can offer superior value to conventional index funds as each DFA fund

is designed to capture the returns of a specific asset class, whereas index funds merely replicate market indexes. We feel DFA funds also provide increased returns through innovative trading strategies and portfolio engineering.

Investing in securities involves risk of loss that clients should be prepared to bear. Such risks include market risk, interest rate risk, currency risk, and political risk, among others. Certain trading strategies can affect investment performance through increased brokerage and other transactions. Each client's propensity for risk however is thoroughly evaluated, documented, and considered throughout the portfolio implementation process.

No investment strategy can assure a profit or avoid a loss.

## **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of the firm or the integrity of its management. Fidelis Financial Planning, LLC is currently not subject to, nor has ever been subject to, any legal or disciplinary events.

## **Item 10 – Other Financial Industry Activities and Affiliations**

Jack D. White teaches a financial planning course part time as an adjunct faculty member for the University of Missouri at St. Louis or Lindenwood University - requiring approximately 6-10 hours per week of his time.

Mark C. Frey maintains approximately a dozen tax, and wealth protection clients requiring approximately 1,500 hours per year of his time.

## **Item 11 – Code of Ethics and Personal Trading**

### **Code of Ethics**

Fidelis Financial Planning, LLC has adopted the CFP® Board Code of Ethics and Professional Responsibility for the firm’s code of ethics. This Code of Ethics establishes principles and standards for both the firm and its affiliated persons. The Code includes the following principals:

**Principle 1 – Integrity:** Provide professional services with integrity.

*Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Advisors are placed in positions of trust by clients, and the ultimate source of that trust is the advisor’s personal integrity. Allowance can be made for innocent error and legitimate differences of opinion, but integrity cannot co-exist with deceit or subordination of one’s principles.*

**Principle 2 – Objectivity:** Provide professional services objectively.

*Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an advisor functions, advisors should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.*

**Principle 3 – Competence:** Maintain the knowledge and skill necessary to provide professional services competently.

*Competence means attaining and maintaining an adequate level of knowledge and skill, and application of that knowledge and skill in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Fidelis advisors make a continuing commitment to learning and professional improvement.*

**Principle 4 – Fairness:** Be fair and reasonable in all professional relationships. Disclose conflicts of interest.

*Fairness requires impartiality, intellectual honesty and disclosure of material conflicts of interest. It involves a subordination of one’s own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated.*

**Principle 5 – Confidentiality:** Protect the confidentiality of all client information.

*Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.*

**Principle 6 – Professionalism:** Act in a manner that demonstrates exemplary professional conduct.

*Professionalism requires behaving with dignity and courtesy to clients, fellow professionals, and others in business-related activities. Advisors cooperate with fellow advisors to enhance and maintain the profession's public image and improve the quality of services.*

**Principle 7 – Diligence:** Provide professional services diligently.

*Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.*

Fidelis Financial Planning, LLC has adopted this Code of Ethics for all supervised persons in our firm and it describes our high standard of business conduct and fiduciary duty to our clients. The Code of Ethics includes provisions about confidentiality of client information, insider trading, rumor mongering, acceptance of significant gifts, reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Fidelis Financial Planning, LLC are required to acknowledge the terms of the Code of Ethics.

The Code of Ethics is designed to help assure that the personal securities transactions, activities and interests of the employees of Fidelis Financial Planning, LLC do not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Jack D. White, the firm's Chief Compliance Officer.

### **Trading Conflicts of Interest**

Individuals associated with Fidelis are permitted to buy or sell securities for their personal accounts identical to or different than those recommended to clients. However, no person employed by the firm is allowed to favor his or her own interest over that of a client or make personal investment decisions based on the investment decisions of advisory clients.

In order to address potential conflicts of interest, Fidelis requires that associated persons with access to advisory recommendations provide annual securities holdings reports and quarterly

transaction reports to the firm's Chief Compliance Officer. The firm also requires prior approval from the Chief Compliance Officer for investing in any IPOs or private placements (limited offerings).

## **Item 12 - Brokerage Practices**

Fidelis Financial Planning, LLC does not maintain custody of client assets. Instead, we require all client assets be maintained in an account at a non affiliated "qualified custodian", generally a broker dealer or bank, whether the account is managed by us or a third party manager. While we may recommend certain brokers or custodians when we manage your account, you will ultimately decide whether to do so and will open your account directly with them. If your account is managed by a third party manager, the manager might recommend a particular custodian.

When recommending brokers or custodians for its clients, Fidelis considers many different factors including quality of service, services offered, execution quality, transaction costs, reputation of the firm, financial resources, jurisdiction registration status, and stability, among others. In determining the reasonableness of a broker's compensation, we consider the overall cost to our clients relative to the benefits received, both directly and indirectly, from the broker.

### Your Brokerage and Custody Costs

Our clients receive various services directly from our custodians. For our clients' accounts that our custodians maintain, the custodians generally do not charge separately for custody services but instead are compensated by charging commissions or other fees on trades that they execute or trades that are executed by other brokers to and from the custodial accounts. Our relationship to the custodians and its relationship to the client are entirely independent of trade commission assessed by the custodians in client accounts.

Since our custodians charge a fee for each trade that we have executed by a different broker-dealer, we have the custodians execute most trades for client accounts in order to minimize trading costs.

We have determined that having the custodians execute most trades is consistent with our duty to seek "best execution" of client trades. Best execution means seeking the most favorable terms for a transaction based on all relevant factors, including those listed above.

### Products and Services Available to Us from Brokers/Custodians

Our custodians provide us and our clients with access to its institutional brokerage services like trading, custody, reporting, and related services, many of which are not typically available to retail customers. Our custodians also make available various support services, some of which may help us

manage or administer our clients' accounts, while others may help us manage and grow our business.

Our custodians' institutional brokerage services which benefit our clients directly include access to a broad range of investment products, execution of securities transactions, and asset custody. The investment products available through our custodians include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

Our custodians also make available to us other products and services that benefit us but may not directly benefit our client or their account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both the custodians' own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at the custodians. In addition to investment research, the custodians also make available software and other technology that provide access to client account data, facilitates trade execution for multiple client accounts, provides pricing and other market data, facilitates payment of our fees from our clients' accounts, and assists with back-office functions, recordkeeping, and client reporting.

Our custodians also offer other services intended to help us manage and further develop our business. These services include educational conferences and events, consulting on technology, compliance, legal, and business needs, publications and conferences on practice management and business succession, and access to employee benefits providers, human capital consultants, and insurance providers.

The availability of these services from our custodians benefits us because we do not have to produce or purchase them. Of course, this may give us an incentive to recommend that you maintain your account with our custodians based on our interests rather than our client's best interest. We believe, however, that our selection of our custodians is in the best interests of our clients, and is primarily supported by the scope, quality, and price of our custodians' services and not those services that benefit only us.

#### Aggregation of Transactions

Fidelis Financial Planning, LLC may, from time to time, aggregate client orders into blocks in order to facilitate more efficient account management and execution. When aggregating orders, an average price is given to all participants in the block, or other measures are taken, in order to treat all accounts fairly.

## Item 13 – Review of Accounts

REVIEWS: Client portfolios with assets under management by Fidelis are reviewed quarterly. Personal *Financial Goal Plans* are reviewed annually on the anniversary date. Client accounts at other money managers are reviewed when the client's financial goal Plan is reviewed, usually annually. Meetings for these reviews preferably take place face to face, but upon preference of the client, they may be held by phone or video conferencing.

REVIEWERS: Jack White, Jeff Laughlin, or Mark Frey reviews all client accounts. Their reviews compare the client's portfolio returns to the returns needed as set forth in the client's personal financial goal Plan. As clients receive monthly or quarterly statements from their broker/dealers, mutual funds and other money managers with assets not managed through Fidelis, the clients are responsible for seeing that Fidelis receives copies of these statements prior to the review to facilitate a more complete evaluation based on the client's goals and goal Plan.

REPORTS: Clients are provided with account statements from their custodian on at least a quarterly basis which list account holdings and transactions for the period. Investment management clients may also be provided with written performance reports on a quarterly basis that detail current market value, performance relative to market benchmarks, and overall portfolio allocation. We urge our clients to carefully review custodial statements and compare them to reports received from us or other managers.

## Item 14 – Client Referrals and Other Compensation

Fidelis Financial Planning, LLC may pay individuals or other professional entities to refer clients to us via a referral agreement. The firm's referral agreements are in compliance with Federal Regulations as detailed in 17 CFR Section 275.206(4)-3, and in each state where state law requires, each client is given a copy of the referral agreement prior to or at the time of entering into any advisory contract. The advisory fee charged to clients will not increase as a result of the referral arrangement.

Fidelis Financial Planning receives economic benefits from our custodians in the form of the support products and services that are made available to us and to other independent investment advisors. These products and services and how they benefit us are described in Item 12 above. The availability to us of our custodian's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

## **Item 15 – Custody**

Fidelis Financial Planning does not hold client funds or securities, but instead requires that they be held by a third party custodian. Fidelis uses Charles Schwab as custodian for client assets and occasionally Fidelity Investments. Although we do not hold client assets, we may however have limited control in some instances to trade on a client's behalf, to deduct our advisory fees from a client's account with authorization, or to request disbursements to clients.

Clients will receive account statements directly from their custodian at least quarterly which will be sent to the postal mailing address provided, or they will receive an electronic notification that they may access their statement on the custodian's website. We urge clients to carefully review such statements and compare such official custodial records to the reports that Fidelis may provide. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Item 16 – Investment Discretion**

Fidelis Financial Planning, LLC does not accept discretionary authority from clients to select securities on their behalf, but clients may delegate discretionary authority to other third party managers. Any discretionary authority which is granted however is subject to the client's risk profile and Investment Policy Statement (IPS), and may be limited by any other limitations provided by the client in writing.

## **Item 17 – Voting *Client* Securities**

As a matter of firm policy and practice, Fidelis Financial Planning, LLC planners do not have any authority to and do not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in their portfolios.

## **Item 18 – Financial Information**

Registered investment advisers are required in some cases to provide certain financial information and or disclosures about their financial condition. For example, if the firm requires prepayment of

fees of more than \$500 per client for six months in advance, has custody of client funds, or has a condition that is reasonably likely to impair its ability to meet its contractual commitments to its clients, it must provide financial information and make disclosures.

Fidelis does not require prepayment of fees of more than \$500 for six months in advance, does not accept custody of client funds, and has no other financial or operating conditions which trigger such additional reporting requirements.

Fidelis Financial Planning, LLC does not receive discretionary authority or custody of client funds, does not require more than \$500 in fees per client, six months or more in advance, and has no financial or operating conditions which trigger such additional reporting requirements.

### **Item 19 – Requirements for State-Registered Advisers**

**Jeffrey M. Laughlin** is owner and President of Fidelis Financial Planning, LLC. He holds a BS in Civil Engineering from Missouri University of Science and Technology, and an MBA with a finance emphasis from the University of Missouri - St. Louis. Prior to joining Fidelis, Jeff served as a Retirement Plan Manager for Moneta Group in Clayton, MO where he managed qualified retirement plans accounting for \$200M+ in assets. Jeff's passion is utilizing the financial planning process to ensure his clients achieve their financial goals. His core competencies are in investment and retirement planning. Jeff is a Certified Financial Planner™ professional and Series 65 licensed. He is a member of the National Association of Personal Financial Advisors (NAPFA) Although he also maintains an insurance license for consultative purposes, he does not sell insurance products. Moreover, he currently donates trailing commissions he may receive from past insurance sales to charity. Mr. Laughlin is President of the firm and consequently does not report to a supervisor.

**Jack D. White** is Founder of Fidelis Financial Planning LLC, a Fee-Only™ independent advisory firm he began after fifteen years of a fee-based practice. He holds a BBA with a major in accounting from Texas Wesleyan University, and an MA in education from Dallas Theological Seminary. Jack has over thirty years of broad experience in the financial services industry, including positions as bank trust officer, trust tax accountant, personal trust officer, employee benefits specialist, and small business management. He is passionate about financial planning education for the public and for his clients. He obtained his CFP® designation in 1997 and taught CFP® review courses as an adjunct faculty member for the College for Financial Planning and the University of Missouri - St. Louis. Since 1998 he has taught at least one financial planning course a semester as adjunct faculty member for the University of Missouri - St. Louis and more recently at Lindenwood University. He served as 2006-2008 President for the Greater St. Louis Area Financial Planning Association (FPA) and he served as a member of the National FPA Chapter Leadership Advisory Council. Jack is a member of the National Association of Personal Financial Advisors (NAPFA) and the Financial Planning Association (FPA). Mr. White reports to Mr. Laughlin, President of the firm.

**Mark C. Frey** is an Investment Advisory Representative with Fidelis Financial Planning, LLC and is also a self employed Certified Public Accountant. He holds a BA from the University of Illinois and a Masters in Taxation from the University of Akron. Prior to forming his own practice in 1989, he served over seven years as an IRS agent. In addition to his front line tax experience, he is a CFP® professional; he has completed the AICPA Certificate of Educational Achievement in Personal Financial Planning, and has earned the Certified Valuation Analyst (CVA), Certified Asset Protection Planner (CAPP), and Certified Wealth Preservation Planner (CWPP™) designations. Mark is a member of the Kentucky Association of CPAs, and the Financial Planning Association (FPA). Mark's office is located in Louisville, Kentucky. Mr. Frey reports to Mr. Laughlin, President of the firm.