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A Commonwealth of Virginia Investment Advisor

Item 1: Cover Page

Form ADV Part 2A Firm Brochure

March 30, 2019

Financial Freedom Planners

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This brochure provides information about the qualifications and business practices of Financial Freedom Planners, LLC. If you have any questions about the contents of this brochure, please contact us at 804-277-9734 or croberts@financialfreedomplanners.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. While the firm and its personnel are registered with the Commonwealth of Virginia, it does not imply a certain level of skill or training on the part of the firm or its personnel.

Additional information about Financial Freedom Planners, LLC is available on the SEC's website at www.adviserinfo.sec.gov. Click on the "Investment Adviser Search" link and then search for "Investment Adviser Firm" using the firm's IARD number, which is 168395.

Item 2: Material Changes

The firm has updated this Form ADV Part 2 from the version dated October 5, 2018 to disclose changes to its fees (please see Item 5 – Fees and Compensation).

You may request our Brochure by contacting Charles R. Roberts, CEO and Chief Compliance Officer at **(804) 277-9734** or croberts@financialfreedomplanners.com. Our brochure is also available on our web site www.financialfreedomplanners.com.

Clients and prospective clients are encouraged to review this document in its entirety.

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Item 4: Advisory Business

Firm Description

Financial Freedom Planners, LLC. (Financial Freedom Planners) was founded in 2013 as a limited liability company organized under the laws of the Commonwealth of Virginia.

Financial Freedom Planners is a registered investment advisor with the Virginia State Corporation Commission, Division of Securities and Retail Franchising. *It should be noted that the term "registered" does not imply a certain level of skill or training.*

Financial Freedom Planners is an independent, employee-owned financial planning and investment advisement firm with its sole office located in Richmond, Virginia. The firm maintains its independence by not having any affiliations with banks, insurance companies or broker/dealers.

Principal Owners

The founder, Charles R. Roberts, CFP® is the firm's CEO and Chief Compliance Officer, owns 100% and is sole principal of the firm.

Description of Advisory Services Offered

Financial Freedom Planners is a “fee-only” investment advisor that provides a broad range of solutions to its clients. “Fee-only” means that we do not sell financial products nor do we receive commissions or referral fees; we only offer our advice and service.

For those interested in areas such as cash flow and budgeting, education funding, retirement planning, risk management, estate planning, tax planning, business consulting, as well as periodic investment advice, we offer our *financial planning and investment consultation services*.

Our Initial Process

For most engagements our client relationship begins with a complimentary, no-obligation, “get-acquainted” session, which may be conducted in person or over the telephone. During this conversation we gain an understanding of your personal goals, your financial needs and objectives, and any areas of concern. This information helps us determine the scope of services to be provided, including the estimated number of hours that will be required. At the end of the meeting you will be provided with a fee estimate based upon the proposed scope of services, as well as a list of any additional resources we may need to continue with your plan.

During or prior to your first meeting, you will be provided with a current ADV Part 2 brochure that includes our privacy policy statement. We will also ensure that we have disclosed any material

conflicts of interest that could be reasonably expected to impair the rendering of unbiased and objective advice.

Should you wish to engage Financial Freedom Planners for its services, we must execute a written client agreement. Once a client agreement is in effect, further discussion takes place to obtain additional information and clarification on your financial needs, goals, current holdings, and other information needed for the firm to analyze your situation and offer advice and planning.

Financial advice and/or plans are based upon the information you or your legal agent provide, and reflect your financial situation at the time the plan is presented. In performing its services the firm may, but is not required to, verify any information received from you or from your legal agents.

Financial Planning and Investment Consultation Services

We provide Fee-Only, hourly or Package-based (fixed), as-needed financial planning and investment advice services to individuals from all walks of life and specialize in providing advice to individuals seeking advice and guidance on retirement. These services may be general in nature or focused on a particular area of interest or need, depending on the individual's unique circumstances.

An estimated 50% of our activities involve providing financial advice, which may include advice on income and expense planning, tax planning, insurance planning, estate planning, retirement planning and education planning. An estimated 50% of our activities involve providing investment advice, which may include advice on asset allocation and investment selection.

Regarding the financial advice process, first we gather information about the client's personal financial situation, then conduct a meeting with the client to clarify the client's personal financial information and determine the client's specific needs, objectives, goals and tolerance for risk. We then analyze the client's current financial situation and possible future scenarios, when appropriate. Next, we present a summary of significant observations, assumptions and recommendations in each area we were engaged to provide advice. The engagement is concluded upon completion of the presentation. The client may re-engage us as needed. Periodic reviews are recommended and it is the client's responsibility to initiate these reviews.

Regarding the investment advice process, first we gather information about the client's personal financial situation, then conduct a meeting with the client to clarify the client's personal financial information and determine the client's specific needs, objectives, goals and tolerance for risk. Then, we recommend a proper asset allocation based on the client's personal financial situation. After the asset allocation is established, we recommend specific investments to fill out the recommended asset allocation. Next, we recommend that the portfolio be maintained by rebalancing about annually and/or making adjustments as needed. The engagement is concluded upon completion of the recommendations. The client may re-engage us as needed. Periodic reviews are recommended and it is the client's responsibility to initiate these reviews.

If you would like our help with implementation of your plan's recommendations, such assistance with transactions will be provided at the firm's hourly rate, over and above the fee for our financial planning packages; please see Item 5 for details.

Real Time Planning Sessions

For clients with one or two financial issues that need to be addressed immediately, Real Time Planning Sessions are offered. A financial planner will meet with you for a two-hour planning session. No preparatory work will be performed ahead of the meeting, nor will a formal report be written. You will leave with an action plan and summary of recommendations discussed. Electronic mail (email) and telephone support will also be available to you for 15 days after the session to answer questions and offer advice on implementing recommendations.

Portfolio Review Services

Financial Freedom Planners offers consultations addressing financial asset allocation, specific selection of investments and specified periodic reviews of your investment portfolio. If you select this service, you may choose to be on a quarterly, semi-annual or annual review schedule, or our Second Opinion service.

Portfolio Reviews typically include:

- ✓ Analysis of Portfolio Asset Allocation with rebalancing suggestions
- ✓ Portfolio Performance Analysis
- ✓ Investment Cash Flow Projections
- ✓ Implementation of Investment Changes
- ✓ Discussion of Tax Loss Harvesting (annual)
- ✓ Updates to Retirement Calculations (annual)
- ✓ Availability for Phone Consultations (as needed)

Second-Opinion Review

- ✓ One hour of preparation/One-hour meeting
- ✓ Portfolio Performance Analysis
- ✓ Asset Allocation Review
- ✓ Risk Tolerance Review
- ✓ Investment snapshot review as of meeting date
- ✓ Written summary report provided
- ✓ Investment statements need to be provided ahead of meeting
- ✓ Electronic mail (email) and telephone support will also be available to you for 15 days after the session to answer questions and offer advice on implementing recommendations.

Best for clients who are not certain how to evaluate the performance of their financial assets. It is also ideal for someone making their own investment decisions, but wish to have an objective third party review their portfolios.

Annual Review

- ✓ Two hours of preparation/One-hour meeting once a year
- ✓ Portfolio Performance Analysis
- ✓ Review of financial goals and plan progress
- ✓ Update to retirement calculation

- ✓ Update to asset allocation
- ✓ Investment snapshot review as of meeting date
- ✓ Written summary report provided
- ✓ Investment statements need to be provided ahead of meeting
- ✓ Any additional discussions throughout year are billed hourly

Best for clients who have most of their assets in employer plans and do not need active management of their investments. It is also ideal for someone making their own investment decisions, but wish to have an objective third party review their portfolios.

Semi-Annual Review

- ✓ Two hours of preparation/One-hour meeting twice a year
- ✓ Semi-annual one-hour meetings
- ✓ Portfolio Performance Analysis
- ✓ Semi-annual update to asset allocation
- ✓ Annual update to retirement calculation
- ✓ Annual analysis of tax loss harvesting opportunities
- ✓ Summary Reports at each meeting
- ✓ Up to four hours of telephone discussions as needed are included in fee. Extensive planning issues may be billed separately on an hourly basis.
- ✓ Client provides access to various accounts through Client Website, or arranges for duplicate mailings to the firm from custodians.
- ✓ Client makes all investment changes/trades.

Best for clients who enjoy and are proficient at managing their own investments but appreciate periodic reviews and advice.

Quarterly Review

- ✓ Two hours of preparation/One-hour meeting four times a year
- ✓ Semi-annual one hour meetings (telephone check-in for other two quarters)
- ✓ Portfolio Performance Analysis
- ✓ Quarterly update to asset allocation
- ✓ Annual update to retirement calculation
- ✓ Annual analysis of tax loss harvesting opportunities
- ✓ Summary Reports at each meeting
- ✓ Up to 12 hours of telephone discussions as needed are included in fee. Extensive planning issues may be billed separately on an hourly basis.
- ✓ Billed quarterly in arrears.

Best for busy clients who have delegated investment decisions to a money manager, but need an objective ongoing review of how it impacts their financial goals and objectives.

Tailored Relationships

Most services that Financial Freedom Planners offer to its clients are customized to their unique needs. With regard to financial planning services, no two plans are alike. Financial Freedom

Planners utilizes state-of-the-art software to meet each client's needs, whether it is a single goals-based analysis, a sophisticated comprehensive cash-flow or estate transfer analysis.

Wrap Fee Programs

Financial Freedom Planners does not participate in any wrap fee programs.

Client Assets

Due to the nature of our advisory services, Financial Freedom Planners does not have reportable client assets under its management.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

Financial Planning and Investment Consultation Services

Our services on an hourly basis are calculated based on the firm's current rate of \$240 per hour. Hourly engagements are billed in 1-minute increments, and a partial 1-minute increment is treated as a whole. We may also charge fixed Package fees that are based on our hourly rate multiplied by the approximate number of hours that are anticipated to provide the requested service.

Financial Planning Packages:

You may have seen from our website generally how we approach prospective clients. We have a 10-Step process, beginning with the initial inquiry. We then recommend what we call a "**Getting to Know You**" meeting, which we can do remotely. We cover most importantly what you are looking for, get a sense for the scope of the project, and discuss fees. **Prior** to the meeting/webinar we ask you to complete a straightforward **Confidential Questionnaire**, which we can provide (it can be found on our website as well). This gives us an opportunity to develop a relationship, and you get a sense as to whether we can address your needs in an affordable manner. We also show you some sample deliverables, and give you an overview of what to expect.

Regarding fees, again it depends on the scope and complexity of the project. We can do a **simple hourly relationship** (\$240 per hour), but generally I recommend one of our packages because of the value they provide to our clients. These Planning Packages give you as a client significant value, as the time investment on our part is generally greater than the overall hourly fee would be in an hourly assignment (and if not, (which has not happened) **your fee would be**

reduced by whatever that difference is). You will receive progress reports along the way as we follow our 10-Step Process.

In addition to an hourly relationship, we have **4 basic packages:**

1. **Comprehensive Plan C (Complex):** This is offered for the more complex plans, such as Multiple Pension Decisions, how a Business or Commercial Property may factor into a plan, Rental Property, Complex Portfolios, Annuities, etc. Investment: a fixed fee of \$4,100 comprised of: a \$500.00 deposit in advance of the project, and 6 monthly payments of \$600.00, for a total of **\$4,100***. Since a Complex Plan averages about 25.5 hours, this represents an **approximate discount of \$2,020 or 33%**. We track all time in any of our plans, and **will either reduce or refund your fee if it takes less time than estimated.** This Comprehensive Plan focuses on:
 - Financial Freedom **Quick-Start Meeting**
 - A thorough Investment Analysis with Recommendations - this is a comprehensive look at ALL your investable assets, including retirement plans. We do a 360 degree review, review overall measurement of risk, and make **specific** recommendations. I've been in the investment world for over 30 years, and this is one of our sweet spots.
 - A thorough **Retirement Plan and Cash Flow Analysis** - we have found over the years the Cash Flow analysis is the backbone for any solid financial and retirement plan. We work together to put everything together in terms of income and expenses, make reasonable assumptions going forward, and review a variety of variables that can impact a retirement. In addition we do an overall Risk Assessment, and review potential needs for Life, Disability, and Long-Term-Care insurance.
 - Social Security Optimization - Your various Social Security Options are evaluated, and through client discussion and interaction decisions are arrived at that best suit the client's needs.
 - Stress Testing of Your Plan - we use a strenuous analysis called "Monte Carlo Simulation" to determine the most probable outcome as well as Best and Worst-Case Scenarios. We then assign the probability of achieving your financial goals within those parameters.
 - One-hour Intermediate Meeting #1 – Goal Setting
 - One-hour Intermediate Meeting #2 – Interactive decision making
 - If needed: One-hour Intermediate Meeting #3
 - 1.5 – 2 hour Plan Presentation Meeting
 - 12 months of continued Client Website support (from date of engagement)
 - 12 months as a resource for reasonable planning questions you may have (from date of engagement)
 - Everything included above, **plus:**
 1. Up to **3** different planning scenarios. Some examples are analyzing various pension distribution options, different spending or savings rates, things that may be on a client's "wish list" to determine if they are accomplishable, etc.
 2. A full review of any investment property, business enterprise, etc. and how they may fit into your financial plan.
 3. An overall Risk Assessment, reviewing potential needs for Life, Disability, and Long-Term Care Insurance (through a licensed, third-party insurance professional).
 4. Etc.

2. **Comprehensive Plan B (Average Complexity):** This planning package encompasses what most clients need - Cash Flow & Retirement Planning, and Investment Analysis with Recommendations. Investment - A fixed fee of \$3,500 comprised of: a \$500.00 deposit, and 6 monthly payments of \$500.00, for a total of **\$3,500***. This represents a **discount of approximately \$1,420.00, or 28.9%** from the hourly approach, assuming the average plan takes 20.5 hours. A **Plan B Project** focuses on the following:

- Financial Freedom **Quick-Start Meeting**
- A thorough **Investment Analysis with Recommendations** - this is a comprehensive look at ALL your investable assets, including retirement plans. We do a 360 degree review, review overall measurement of risk, and make specific recommendations. I've been in the investment world for over 30 years, and this is one of our sweet spots.
- A thorough **Retirement Plan and Cash Flow Analysis** - we have found over the years the Cash Flow analysis is the backbone for any solid financial and retirement plan. We work together to put everything together in terms of income and expenses, make reasonable assumptions going forward, and review a variety of variables that can impact a retirement. In addition we do an overall Risk Assessment, and review potential needs for Life, Disability, and Long-Term-Care insurance.
- Social Security Optimization - Your various Social Security Options are evaluated, and through client discussion and interaction decisions are arrived at that best suit the client's needs.
- Stress Testing of Your Plan - we use a strenuous analysis called "Monte Carlo Simulation" to determine the most probable outcome as well as Best and Worst-Case Scenarios. We then assign the probability of achieving your financial goals within those parameters.
- One-hour Intermediate Meeting #1 – Goal Setting
- One-hour Intermediate Meeting #2 – Interactive decision making
- 1.5 – 2 hour Plan Presentation Meeting
- 12 months of continued Client Website support (from date of engagement)
- 12 months as a resource for reasonable planning questions you may have (from date of engagement)

3. **Plan B-Investments or Plan B-Retirement: Choose YOUR Highest Priority:**

Investment - A fixed fee of \$2,300 comprised of: a \$500.00 deposit, and 6 monthly payments of \$300.00, for a total of **\$2,300***. This represents a **discount of approximately \$820, or 26.3%** from the hourly approach, assuming the average plan takes 13 hours. A **Plan B-Investments or Retirement Project** focus on the following:

- **Plan B-Investments** A thorough Investment Analysis with Recommendations - this is a comprehensive look at ALL your investable assets, including retirement plans. We do a 360 degree review, review overall measurement of risk, and make specific recommendations. Not only do we examine your overall Asset Allocation in context with your Risk Tolerance, we provide detailed specific investment recommendations. I've been in the investment world for over 30 years, and this is one of our sweet spots.

OR

- **Plan B-Retirement** A thorough **Retirement Plan and Cash Flow Analysis** - we have found over the years the Cash Flow analysis is the backbone for any solid financial and retirement plan. We work together to put everything together in terms of income and expenses, make reasonable assumptions going forward, review the Asset Allocation of your investments, and review a variety of variables that can impact a retirement. In addition we do an overall Risk **Assessment**, and review potential needs for **Life, Disability, and Long-Term-Care insurance**. We also analyze **Social Security Optimization** - Your various Social Security Options are evaluated, and through client discussion and interaction decisions are arrived at that best suit the client's needs. We also use a strenuous probability analysis called "Monte Carlo Simulation" to determine the most probable outcome as well as Best and Worst-Case Scenarios. We then assign the probability of achieving your financial goals within those parameters.

Either of these projects **INCLUDES**:

- Financial Freedom **Quick-Start Meeting**
- One-hour Intermediate Meeting #1 – Goal Setting
- One-hour Intermediate Meeting #2 – Interactive decision making
- 1.5 – 2 hour Plan Presentation Meeting
- 12 months of continued Client Website support (from date of engagement)
- 12 months as a resource for reasonable planning questions you may have (from date of engagement)

4. **Single Project/Second Opinion/Real-Time Planning**

Session: Investment - A fixed fee of \$800 comprised of: a \$400 deposit and 2 monthly payments of \$200.00, for a total of **\$800*** (a discount of approximately **33.3%**). This includes: Financial Freedom **Quick-Start** (approximately 1 hour), setting up the framework for your plan prior to our meeting (2 hours prep time), and see how much we can accomplish together in 2 hours. We will supply you with a written PDF of the plan we produce, and can always add to the project if need be. This is more oriented toward younger clients with rather simple plans, or smaller projects such as second opinions, pension buy-outs, etc.

* **Implementation Assistance Fees:** Financial Plan Packages do not include assistance with implementation beyond implementation questions you may have (such as helping you with the trades in your portfolio). Should you require such assistance it will be considered outside the scope of work outlined in this contract, and shall be billed at the firm's current hourly rate of \$240. Financial Freedom Planners agrees to notify client of such fees prior to providing such assistance.

Plan Review Subscription Services (12 months after the date of your initial plan engagement)

For current clients we offer **Ongoing Subscription Agreement Services** designed to:

- √ **Offer an alternative billing approach to receive needed services**
- √ **Provide ongoing financial advice for existing clients**
- √ **Make it easier on the budget**

Choose which service is right for you:

Silver - Annual Checkup

Benefits: Receive ongoing access and support to your FFP Client Wealth Management
Website
Annual checkup phone call
Cost: \$60.00 per month

Gold - Annual Review + Quarterly Checkup

Benefits: Receive ongoing access and support to your FFP Client Wealth Management
Website
Formal Annual Review
Quarterly checkup phone call
Cost: \$90.00 per month

Platinum - Semi-Annual Review + Monthly Checkup

Benefits: Receive ongoing access and support to your FFP Client Wealth Management
Website
Two Formal Semi-Annual Reviews
Monthly checkup phone call
Cost: \$120.00 per month

Educational Workshops

Financial Freedom Planners may conduct group educational workshops for which we may impose a fee. In most cases, the employer, civic or non-profit group sponsoring the workshop pays any such fee, and the individual attendees are not charged. In the event that workshop attendees would be required to pay a fee, the amount of the fee would be clearly disclosed in the event's announcement and/or invitation and not to exceed \$250 per attendee per session.

Negotiable Fees

The services to be provided to you and their specific fees will be detailed in your engagement agreement. Our published fees may be discounted by our firm but they are not negotiable. We strive to offer fees that are fair and reasonable in light of the experience of the firm and the services to be rendered to our clients, however, similar services may be made available from other providers and potentially at a lower fee.

Other Fees

In connection with using our services, the client may also incur separate fees and expenses that are charged by mutual funds and/or exchange traded funds (ETFs). We recommend that the client review the investment prospectus for a complete explanation of these fees and expenses. In addition, the client may also incur separate transaction costs or administration fees from brokerage firms. We recommend that the client obtain a complete schedule of fees from their brokerage firm. We do not receive any portion of these other fees. We do not receive commissions or third-party payments of any kind. The only compensation we receive is in the form of hourly fees paid directly by the client.

Termination of Services

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

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

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

Sharing of Capital Gains or Capital Appreciation

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

Item 7: Types of Clients

Description

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

Account Minimums

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

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

Methods of Analysis

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

Investment Strategies

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

Risk of Loss

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

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

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

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

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

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

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

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

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

Item 9: Disciplinary Information

Legal and Disciplinary

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

Criminal or Civil Action

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

Administrative Proceeding

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

Self-Regulatory Proceeding

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

Item 10: Other Financial Industry Activities and Affiliations

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

Broker-Dealer or Registered Representative

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

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

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

Material Relationships or Arrangements with Financial Industry Entity

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

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

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

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

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

Code of Ethics

Financial Freedom Planners has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all associated persons of the firm. We accept the obligation not only to comply with the mandates and requirements of all applicable laws and regulation, but also to take responsibility to act in an ethical and professionally responsible manner in all professional

services and activities. We will be happy to provide a copy of our Code of Ethics to any client or prospective client, upon request.

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

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

Recommend Securities with Material Financial Interest

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

Invest in Same Securities Recommended to Clients

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

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

- Serving their own personal interests ahead of clients
- Taking inappropriate advantage of their position with the firm, and

- Any actual or potential conflicts of interest or any abuse of their position of trust and responsibility

Item 12: Brokerage Practices

Selecting Brokerage Firms

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

Research and Soft Dollars

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

Brokerage for Client Referrals

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

Directed Brokerage

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

Item 13: Review of Accounts

Periodic Reviews

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

If the firm is engaged to review client accounts, the review will be performed by Mr. Roberts. The clients will always receive the official account statements and transaction confirmations

directly from their custodian. These official documents should be read carefully and compared to any report received from the firm.

Item 14: Client Referrals and Other Compensation

Economic Benefits

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

Third-Party Solicitors

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

Item 15: Custody

Account Statements

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

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

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

Item 16: Investment Discretion

Discretionary Authority for Trading

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

Item 17: Voting Client Securities

Proxy Voting

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

Item 18: Financial Information

Financial Condition

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

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

Item 19: Requirements for State-Registered Advisers

Principal Executive Officers and Management Persons

Charles R. Roberts, born 1952

Formal Education

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

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

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

Business Background

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

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

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

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

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

Description of Professional Designations

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

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

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

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

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

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

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

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

Investment-Related Other Business Activities

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

Additional Compensation

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

Legal or Disciplinary Events

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

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

Financial Freedom Planners

Financial Freedom Planners, LLC.

A Commonwealth of Virginia Investment Advisor

ADV Part 2B – Brochure Supplement (Charles R. Roberts)
Item 1. Cover Page

Charles R. Roberts, CFP®

Financial Freedom Planners
3741 Westerre Parkway, Suite C
Richmond, VA 23233
804.277.9734

March 30, 2019

This brochure provides information about Charles R. Roberts that supplements Financial Freedom Planners' firm brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Charles R. Roberts, Chief Compliance Officer at 804.277.9734 if you did not receive Financial Freedom Planners' brochure or if you have any questions about the contents of this supplement.

Additional information about Charles R. Roberts is available on the SEC's website at www.adviserinfo.sec.gov. Click on the "Investment Adviser Search" link and then search for "Investment Adviser Representative (IAR)" using "Charles R. Roberts."

Item 2: Educational Background & Business Experience

Name, Year of Birth

Charles R. Roberts, born 1952

Formal Education

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

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

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

Business Background

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

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

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

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

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

Description of Professional Designations

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

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

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

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

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

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics Renewal** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® Professionals must provide financial planning services in the best interests of their clients.

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

Item 3: Disciplinary Information

Legal or Disciplinary Events

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

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

Item 4: Other Business Activities

Investment-related Activities

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

Other Business or Occupation for Compensation

Mr. Roberts is not involved in any business other than his involvement with Financial Freedom Planners.

Item 5: Additional Compensation

Economic Benefit

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

Item 6: Supervision

Describe Supervision

As an employee of Financial Freedom Planners, Mr. Roberts is subject to the firm's Code of Ethics. The purpose of the Code is to ensure that the high ethical standards maintained by Financial Freedom Planners continue to be applied. Charles Roberts serves in multiple capacities for Financial Freedom Planners, LLC: Managing Member, Chief Executive Officer, Financial Planner and Investment Adviser Representative (IAR). We recognize that the lack of

segregation of duties may potentially create conflicts of interest. However, we employ policies and procedures to ensure timely and accurate recordkeeping and supervision, including outsourcing certain functions to qualified entities to assist in these efforts when necessary.

Item 7: Requirements for State-Registered Advisers

Supervised Person

Mr. Roberts has not been involved in any of the following: an arbitration claim of any kind; an award or otherwise being found liable in any civil, *self-regulatory organization*, or administrative proceeding; the subject of a bankruptcy petition.

Questions about Financial Freedom Planners, LLC, its personnel, its services or this document may be addressed with Charles Roberts at 804.277.9734 or croberts@financialfreedomplanners.com.

Financial Freedom Planners

Financial Freedom Planners, LLC.

A Commonwealth of Virginia Investment Advisor

ADV Part 2B – Brochure Supplement (John Condon)
Item 1. Cover Page

John Condon, CFP®

Financial Freedom Planners
3741 Westerre Parkway, Suite C
Richmond, VA 23233
804.277.9734

March 30, 2019

This brochure provides information about John Condon that supplements Financial Freedom Planners' firm brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Charles R. Roberts, Chief Compliance Officer at 804.277.9734 if you did not receive Financial Freedom Planners' brochure or if you have any questions about the contents of this supplement.

Additional information about John Condon is available on the SEC's website at www.adviserinfo.sec.gov. Click on the "Investment Adviser Search" link and then search for "Investment Adviser Representative (IAR)" using "John Condon."

Item 2: Educational Background & Business Experience

Name, Year of Birth

John Condon, born 1963

Formal Education

Mr. Condon earned a Bachelor of Business Administration in Business Management from the College of William and Mary in Williamsburg, VA and a Master of Business in Business Management from Georgia State University in Atlanta, GA.

In addition, he earned his Certificate in Financial Planning from Penn State University in 2016 and obtained the CFP Designation in 2017.

Business Background

Financial Freedom Planners, LLC; Richmond, VA (Dec 2018 – Present)
Investment Adviser Representative (part-time independent contractor)

Financial Freedom Planners, LLC; Richmond, VA (Dec 2016 – Dec 2018)
Paraplanner (part-time independent contractor)

Capital One; Richmond, VA (Jan 2009 – Present)
Staffing Analyst (part-time)

Description of Professional Designations

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

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

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

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas

include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® Professionals.

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

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics Renewal** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® Professionals must provide financial planning services in the best interests of their clients.

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

Item 3: Disciplinary Information

Legal or Disciplinary Events

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

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

Item 4: Other Business Activities

Investment-related Activities

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

Other Business or Occupation for Compensation

Mr. Condon is compensated for his role as a Staffing Analyst at Capital One. Our firm has determined this does not present a conflict of interest and does not hinder Mr. Condon's ability to fulfill his duties to advisory clients.

Item 5: Additional Compensation

Economic Benefit

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

Item 6: Supervision

Describe Supervision

As an IAR of Financial Freedom Planners, Mr. Condon is subject to the firm's Code of Ethics. The purpose of the Code is to ensure that the high ethical standards maintained by Financial Freedom Planners continue to be applied. Mr. Charles Roberts, CEO and CCO, is responsible for supervising Mr. Condon's advisory activities.

Item 7: Requirements for State-Registered Advisers

Mr. Condon has not been involved in any of the following: an arbitration claim of any kind; an award or otherwise being found liable in any civil, *self-regulatory organization*, or administrative proceeding; the subject of a bankruptcy petition.

Questions about Financial Freedom Planners, LLC, its personnel, its services or this document may be addressed with Charles Roberts at 804.277.9734 or croberts@financialfreedomplanners.com.