# HENSSLER Financial



# G.W. Henssler & Associates, Ltd. Henssler Asset Management, LLC

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### October 24, 2019

This brochure provides information about G.W. Henssler & Associates, Ltd.'s ("GWH") and Henssler Asset Management's ("HAM") qualifications and business practices. If you have any questions about this brochure's contents, please contact us at (770) 429-9166 or experts@henssler.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.

GWH and HAM are federally registered investment advisers. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications an adviser provides to you contain information you can use to determine whether you want to hire or retain that adviser.

GWH and HAM do business as Henssler Financial ("Henssler"). Henssler Financial consists of GWH and HAM and several related entities including DiLuzio & Henssler, Inc. ("DH"), Henssler CPAs and Advisers, LLC (HCPA), Henssler Norton Insurance, LLC ("HN"), Henssler Insurance, LLC ("HI"), and Henssler Small Business Services ("HSBS").

Additional information about Henssler also is available on the SEC's website at www.adviserinfo.sec.gov.

## **Item 2 - Material Changes**

The United States Securities and Exchange Commission (the "SEC") previously published "Amendments to Form ADV," which amended the disclosure document that we provide to clients as required by SEC rules. Under these rules, Item 2 – Material Changes only discusses specific material changes that are made to the brochure. It also provides clients with a summary of the changes.

In the past we offered or delivered information about our qualifications and business practices to clients on at least an annual basis. The above SEC rules require that we at least annually deliver to our clients a summary of any significant or material changes to this and future brochures. We will notify you regarding these changes within 120 days of the close of Henssler's fiscal year. We may also provide other ongoing disclosure information about material changes as necessary. We will provide you with a new brochure as necessary based on changes or new information, at any time, without charge.

From Henssler's last annual update in March 2018, only non-material and technical changes were made to the Brochure. The only changes made to the Brochure since the last annual update were not significant or material and, therefore, are not included in this Item 2.

This brochure may be requested by contacting your Henssler Associate at (770) 429-9166 or by email to ADV@henssler.com. Our current brochure is also available on our website www.henssler.com, free of charge.

Additional information about Henssler is also available via the SEC's website www.adviserinfo.sec.gov. The SEC's website provides information about any persons affiliated with Henssler who are registered, or are required to be registered, as investment adviser representatives of Henssler.

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## Item 4 - Advisory Business

#### **History**

Gene W. Henssler, Ph.D., ("Dr. Gene") and his wife, Patricia, moved to Kennesaw, Georgia in May 1986 when Dr. Gene accepted the Professor of Finance position at Kennesaw State University. A station manager for a local AM radio station asked the department chairman at Kennesaw if he knew someone from academia who could do a talk show about finance, money and investing. The department chairman suggested Dr. Gene.

Dr. Gene started by doing a couple of guest spots with Atlanta radio personality Neal Boortz. Shortly thereafter, Dr. Gene was offered his own show. Although he was not highly compensated, the radio show provided exposure for Kennesaw State University and gave Dr. Gene a healthy ego boost as a radio personality.

After a couple of weeks on the air, callers began asking Dr. Gene if he would provide advice to individuals, on a consulting basis. Callers wanted Dr. Gene to apply the same fact-based, no nonsense approach that he had on his radio show to their own financial endeavors.

GWH was created in 1987 to meet this growing interest. It began as a small, part-time consulting business based out of his home. Dr. Gene reviewed portfolios and offered investment advice on an hourly, fee-only basis. He created a "Financial Plan" for clients and detailed specifically how to work that plan. In turn, clients would "work the plan" with their own stockbroker, or a stockbroker Henssler recommended, with no financial benefits to Henssler. Dr. Gene continues to own a majority interest in Henssler. Other current Henssler employees hold a minority interest in the company.

#### Working the Plan

While clients seemed to appreciate Dr. Gene's advice, Dr. Gene soon began to notice that people would start fervently working the plan, and then life would intervene. The kids would go back to school, soccer practice would start, holidays would roll around, and they would let things go. Clients would come back in a year or two and those who worked the plan were right on target, but then, there were those who got sidetracked.

Within five years, Dr. Gene hired his first employee to assist clients in carrying out their financial plan. Henssler worked for an hourly fee with clients and their brokers. However, Henssler had clients who were behind financially because they did not do what was recommended or follow the advice given. It would be a while before Dr. Gene could sit with his clients and suggest that they consider having their money managed on a percentage-fee basis by Henssler. In the interim, Dr. Gene continued teaching and Henssler's client base grew steadily.

In 1991, an attorney asked Henssler to manage his client's funds. Dr. Gene spent several days trying to figure out how to accomplish this. Around this time, Charles Schwab & Co., Inc. was starting its Financial Advisor's Service program (now Schwab Institutional). Henssler started working with Schwab as the custodian and took this attorney's client as Henssler's first "managed client."

As the Management Program developed, now called The Traditional Management Program, Henssler worked on making it successful.

## As Always

The service provided by Henssler from the beginning is still firmly practiced today. Henssler recognizes that every client is not the same and treats each and every client on an individual basis. Every client has different liquidity needs, goals and attitudes. Focusing on each client as an individual maintains the unique client base. Clients may impose specific restrictions on investing in certain securities or types of securities. Henssler aims to help clients comfortably reach their goals for retirement and life. Providing a consistently high level of service that meets the needs of our individual clients is critical to that process.

#### Services Offered by Henssler

Henssler provides a wide range of services to its clients. These services may include comprehensive financial planning, targeted analysis of a client's financial position, service as a separate account manager, automated asset management and basic investment advice. The investment related services are generally classified as either discretionary investment management or non-discretionary investment advice. These services are provided to both individuals and institutions.

During the initial client meeting, our clients learn about the many types of services Henssler offers. Each client meets with an Associate to discuss the scope of services required based upon each individual client's needs. In general, the advice given as to financial, tax, insurance, estate and investment planning will be similar for both discretionary investment management and non-discretionary investment advice. The main differences are in the ongoing support and execution of the investment recommendations.

#### **Non-Discretionary Services**

Under a non-discretionary relationship, Henssler provides the recommendations for the aforementioned services but does not execute or monitor the recommendations. Henssler will not follow up with the client's progress on the advice unless outlined in the services agreement signed by the client, or when otherwise requested by the client. A non-discretionary relationship is generally used when a client wants financial planning or investment recommendations based on a one-time or periodic review of their situation, or has a specific question they want answered, such as: "Am I saving enough for retirement;" "Is my current allocation appropriate given my stage of life;" "How should I invest my 401(k) or rollover IRA." This service is not as robust or comprehensive as a discretionary investment management relationship. Henssler can be retained to render advice on these and other questions based on an hourly fee or a flat fee.

#### **Discretionary Services**

The majority of our investment management clients use our traditional approach of combining financial planning services with asset management. For clients who choose to use the traditional combined services of financial planning and asset management, we use a comprehensive cash flow analysis based on information provided by the client to make a recommendation for the allocation of the investment portfolio. The portfolio will be managed based on ongoing changes to the cash flow analysis and overall financial plan. This could include updates to the strategy based upon life-changing spending or income events. Examples include marriage, childbirth or adoption, promotion, divorce, inheritance and death. There are a multitude of situations that are considered when creating, implementing, monitoring and reporting on an investment strategy.

Alternatively, a discretionary investment management relationship may not include comprehensive financial planning. Some individual clients or institutional clients may have their own investment strategy or plan, which Henssler will execute on behalf of the client. For the client who does not request comprehensive financial planning, we will work with the client to determine an acceptable asset allocation and execution plan. The agreed upon allocation will be monitored and executed at Henssler's discretion. Henssler may also serve a client as a separate account manager or sub-adviser.

Typically, Henssler is retained to provide discretionary-based investment management services based upon a percentage of assets under management or as a flat fee.

#### **Henssler Automated Investment Management**

We provide portfolio management services through Institutional Intelligent Portfolios™, an automated, online investment management platform for use by independent investment advisors and sponsored by Schwab Wealth Investment Advisory, Inc. (the "Program" and "SWIA," respectively). Through the Program, we offer clients a range of investment strategies we have constructed and manage, each consisting of a portfolio of exchange traded funds ("ETFs") and a cash allocation. The client may instruct us to exclude up to three ETFs from their portfolio. The client's portfolio is held in a brokerage account opened by the client at SWIA's affiliate, Charles Schwab & Co., Inc. ("CSC").

We are independent of and not owned by, affiliated with, or sponsored or supervised by SWIA, CSC or their affiliates (together, "Schwab"). The Program is described in the Schwab Wealth Investment Advisory, Inc. Institutional Intelligent Portfolios™ Disclosure Brochure (the "Program Disclosure Brochure"), which is delivered to clients by SWIA during the online enrollment process.

We, and not Schwab, are the client's investment advisor and primary point of contact with respect to the Program. We are solely responsible, and Schwab is not responsible, for determining the appropriateness of the Program for the client, choosing a suitable investment strategy and portfolio for the client's investment needs and goals, and managing that portfolio on an ongoing basis. SWIA's role is limited to delivering the Program Disclosure Brochure to clients and administering the Program so that it operates as described in the Program Disclosure Brochure.

We have contracted with SWIA to provide us with the technology platform and related trading and account management services for the Program. This platform enables us to make the Program available to clients online and includes a system that automates certain key parts of our investment process (the "System"). The System includes an online questionnaire that helps us determine

the client's investment objectives and risk tolerance and select an appropriate investment strategy and portfolio. Clients should note that we will recommend a portfolio via the System in response to the client's answers to the online questionnaire. The client may then indicate an interest in a portfolio that is one level less or more conservative or aggressive than the recommended portfolio, but we then make the final decision and select a portfolio based on all the information we have about the client. The System also includes an automated investment engine through which we manage the client's portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects).

We do not receive a portion of a wrap fee for our services to clients through the Program. Clients do not pay fees to SWIA in connection with the Program, but we charge clients a fee for our services as described below under Item 5. Clients do not pay brokerage commissions or any other fees to CSC as part of the Program. Schwab does receive other revenues in connection with the Program, as described in the Program Disclosure Brochure.

We do not pay SWIA fees for its services in the Program so long as we maintain \$100 million in client assets in accounts at CSC that are not enrolled in the Program. If we do not meet this condition, then we pay SWIA an annual fee of 0.10% (10 basis points) on the value of our clients' assets in the Program. This fee arrangement gives us an incentive to recommend or require that our clients with accounts not enrolled in the Program be maintained with CSC.

#### Separate Account Manager

As part of our discretionary investment advisory services, Henssler may recommend that clients use the services of a separate account manager to manage the entire, or a portion of the, investment portfolio. After gathering information about a client's financial situation and objectives, we may recommend that the client engage a specific separate account manager or investment program. When recommending a separate account manager, Henssler considers their performance, analysis methods and fees, along with the client's financial needs, investment goals, risk tolerance and investment objectives. Henssler monitors each separate account manager's performance to ensure its management and investment style remains aligned with the client's investment goals and objectives.

Each selected separate account manager will actively manage the client's portfolio and will assume discretionary investment authority over the account. Henssler will assume discretionary authority to hire and fire each separate account manager and/or reallocate assets to another separate account manager when we deem it appropriate and when in the client's best interest.

Henssler will continue to provide advisory services as needed for the ongoing monitoring and review of account performance. Henssler charges a negotiable annual advisory fee for these services. The fees are generally 1.0% of the value of the assets being managed by the separate account manager. For such accounts, our fee is in addition to the fees charged by the separate account manager. Henssler's fee is invoiced monthly in advance.

Advisory fees that you pay to the separate account manager are established and payable in accordance with the disclosure brochure provided by each separate account manager to whom you are referred. These fees may or may not be negotiable. Clients should review the recommended separate account manager's disclosure brochure and take into consideration the separate account manager's fees along with Henssler's fees to determine the total amount of fees associated with the program.

Clients may be required to sign an agreement directly with each recommended separate account manager. Clients may terminate the advisory relationship with the separate account manager according to the terms of the agreement with them. Clients should review each separate account manager's disclosure brochure for specific information on how to terminate the advisory relationship with them, and how a client may receive a refund for any fees paid in advance. Clients should contact Henssler directly with questions regarding the advisory agreement with any separate account manager.

## Henssler's Client Assets Under Management

Total assets under management: \$2,027,613,208.96

G.W. Henssler & Associates, Ltd.:

<u>Type of Assets</u> <u>Amount</u>

Discretionary: \$1,568,584,840.29

Non-Discretionary: \$277,450,849.61

Total: \$1,846,035,689.90

Henssler Asset Management, LLC:

<u>Type of Assets</u> <u>Amount</u>

Discretionary: \$98,889,292.67

Non-Discretionary: \$82,688,226.39

Total: \$181,577,519.06

Total assets under management are listed as of September 30, 2019 for Henssler, which combines the assets under management for GWH and HAM.

#### <u>Item 5 – Fees and Compensation</u>

All fees charged by Henssler are subject to negotiation.

The specific manner in which fees are charged by Henssler is established in a client's written agreement with Henssler. Advisory fees paid by clients are generally based upon a percentage of assets under management, or an hourly or fixed rate, and will depend upon the type and size of the account and the specific financial strategy employed. Henssler generally bills its fees on a monthly or quarterly basis in advance. Unless otherwise specifically negotiated and agreed to by Henssler, Client authorizes Henssler to directly debit fees from their accounts. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. Any earned, unpaid fees will be due and payable. Henssler may provide certain services to clients, employees of the firm, their friends and family members, or certain trade groups, businesses or classes of individuals on a discounted or gratuitous basis (the "Discounted Services"). The provision of these Discounted Services should not have an impact upon the fees charged or services rendered by Henssler to other clients.

Henssler's fees are exclusive of brokerage commissions, transaction fees and other related costs and expenses, which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third-party separate account managers and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. 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 in addition to Henssler's fee.

Item 12 – Brokerage Practices further describes the factors that Henssler considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (for example, commissions).

#### **Henssler Automated Investment Management**

Through the Henssler Automated Investment Management Program, Henssler Financial has combined a computerized digital asset management platform with carefully conceived exchange-traded fund portfolios designed to cater to your risk tolerances and time frame for your investing goals. The ETFs used for investment offer exposure to a particular asset class, industry,

commodity, or region in addition to being more transparent in terms of their underlying holdings. ETFs are filtered through a carefully selected set of stringent criteria to ensure diversity and cost efficiency.

#### **Program Includes:**

#### **Electronic Communications**

This includes online account setup, dedicated email for questions, dedicated voicemail system (with responses primarily via email), eStatements and eBilling.

#### **Automatic Daily Trading**

Depending on the strategy and risk profile indicated by the client, the account can be set to automatically trade daily if necessary to maintain a portfolio designed for optimal long-term wealth.

#### **Automatic Rebalancing**

Portfolios are monitored by a computerized system daily, and automatically rebalanced when an asset class weight drifts too far from the intended target. Inherent market volatility causes investments to rise and fall in value, so rebalancing helps ensure that your portfolio stays on track with your targeted level of risk.

#### **Automatic Tax Loss Harvesting**

If selected, tax-loss harvesting is available for clients with invested assets of \$50,000 or more. By realizing a loss in a security that has experienced a loss, investors are able to offset taxes on both gains and income. However, the ability to realize significant tax benefits from this strategy depends upon a variety of factors, and no assurance can be offered that a particular investor will in fact realize significant tax benefits.

#### Fee Structure:

Annual Fee 0.5%, billed quarterly

Minimum Investment \$5,000

#### **Comprehensive Financial Planning**

Comprehensive Financial Planning with Cash Flow Analysis provides our most extensive financial plan addressing both personal and business-related needs. We provide a detailed analysis of your financial situation that aims to grow and preserve your wealth to last throughout your career and retirement years. This analysis becomes the basis of a personalized financial plan—a road map for you to follow that addresses your retirement spending needs and portfolio investments, as well as your insurance, estate and education planning needs.

#### **Program Includes:**

#### **Financial Planning**

Prepare comprehensive cash flow projections based on your current financial status and income/spending patterns. Cash flow projections include all retirement income sources and provide recommendations on how funds should be used to meet your desired goals.

## **Retirement Planning**

Help you determine and quantify your retirement goals by providing a detailed analysis of the various sources of retirement income—including your retirement benefit programs—to determine if your goals are attainable.

## Portfolio Analysis

Analysis of your taxable and tax deferred investment portfolios to provide recommendations on asset allocations designed to help you meet your goals.

#### **Insurance Analysis**

Help determine the amount of life insurance and disability insurance that should be appropriate for you.

#### **Estate Plan Review**

Review your estate plan to make sure it reflects your wishes and minimizes your estate taxes

## **Education Analysis**

If applicable, help determine the type of education savings account appropriate for your situation.

#### Fee Structure:

One-Time Fee \$5,000

#### **Asset Management**

Our Asset Management Program has been designed to be flexible enough to cater to each individual's financial situation. The Asset Management Program offers you the power and experience of Henssler Financial without any of the headaches associated with investing. Henssler Financial's Asset Management Program is a money management program.

#### **Program Includes:**

#### **Investment Planning**

Develop an investment strategy based on your risk tolerances and investment time horizon. We will work with the client to determine an acceptable asset allocation and execution plan. We will manage and direct your portfolio based on this investment strategy. Equities, Exchange-Traded Funds or Mutual Funds in your portfolio will be selected based upon our strict quality standards.

#### Performance Reporting

We will provide semiannual performance reports.

#### Fee Structure:

Asset Management with Exchange-Traded Funds or Mutual Funds

The first \$1 Million	0.75%
\$1 Million—\$3 Million	0.65%
\$3 Million—\$5 Million	0.50%
\$5 Million and above	Negotiable

Minimum Fee \$3,000

#### Asset Management with Individual Stocks

The first \$1 Million	1.00%
\$1 Million—\$3 Million	0.85%
\$3 Million—\$5 Million	0.65%
\$5 Million and above	Negotiable
Minimum Fee	\$5,000

## **Traditional Management**

These services form a comprehensive program, combining financial planning with money management. We provide a detailed analysis of your financial situation that aims to grow and preserve your wealth to last throughout your career and retirement years. This analysis becomes the basis of a personalized financial plan, executed by us, that addresses retirement spending needs, portfolio investments, insurance, estate and education planning needs.

## **Program Includes:**

#### Financial Planning

Prepare comprehensive cash flow projections based on your current financial status and income/spending patterns. Cash flow projections include all retirement income sources and provide recommendations on how funds should be used to meet your desired goals.

#### **Money Management**

Manage investments in your portfolio based on our strict quality standards, cash flow projections and tax planning considerations tailored to your financial situation.

#### **Retirement Planning**

Help you determine and quantify retirement goals by providing a detailed analysis of the various sources of retirement income—including your retirement benefit programs—to determine if your goals are attainable.

#### Portfolio Analysis

Analysis of your taxable and tax deferred investment portfolios to provide recommendations on asset allocations designed to help you meet your goals.

#### **Insurance Analysis**

Review your insurance needs and help determine the appropriate amount for your situation. This could include a review of your property and casualty, life, disability and long-term care coverages.

#### Estate Plan Review

Review your estate plan to make sure it reflects your wishes and minimizes estate taxes.

#### **Education Analysis**

If applicable, help determine the type of education savings account appropriate for your situation.

#### Fee Structure:

Traditional Management with Individual Stocks

The first \$1 Million	1.25%
\$1 Million—\$2 Million	1.00%
\$2 Million—\$3 Million	0.90%
\$3 Million—\$5 Million	0.75%
\$5 Million and above	Negotiable
Minimum Fee	\$12,000

#### Wealth Management

This program allows you to take advantage of all the serviced provided by Henssler Financial. This program combines financial planning, money management and tax preparation. You will gain the added advantage of having an integrated financial service team that works together daily.

#### **Program Includes:**

#### Financial Planning

Prepare comprehensive cash flow projections based on your current financial status and income/spending patterns. Cash flow projections provide recommendations on how funds should be used to meet your desired goals. We can also recommend changes to your current plan designed to help you reach your objectives.

#### Money Management

Manage investments in your portfolio based on your cash flow projections and tax planning considerations tailored to your financial situation. Manage fixed-income investments based on your cash flow projections, tax planning considerations and our strict quality standards.

#### **Retirement Planning**

Help you determine and quantify retirement goals by providing a detailed analysis of the various sources of retirement income to determine if your goals are attainable. Recommend allocations and investment choices in company retirement plans.

#### **Insurance Planning**

Review your insurance needs and help determine the appropriate amount for your situation. This could include a review of your property and casualty, life, disability and long-term care coverages. Work directly with insurance professionals to provide adequate coverage.

#### **Tax Planning and Preparation**

Prepare your 1040 and provide a tax projection each year.

#### Estate Planning

Trouble shoot potential problem areas and coordinate with professionals to implement solutions.

### **Philanthropic Planning**

Help create a giving plan that matches your desires with all the tax benefits allowable by law.

#### Fee Structure:

Wealth Management with Individual Stocks

The first \$1 Million	1.25%
\$1 Million—\$2 Million	1.00%
\$2 Million—\$3 Million	0.90%
\$3 Million—\$5 Million	0.75%
\$5 Million and above	Negotiable
Minimum Fee	\$25,000

#### **General Fee Information**

The advisory fee charged is calculated as described above. It is not charged on the basis of a share of capital gain upon or capital appreciation of the advisory client's funds. A client agreement may be canceled at any time, by either party, for any reason. A written cancellation notice must be given 30 days in advance. Upon termination of any account, any prepaid, unearned fees will be promptly refunded.

All fees paid to Henssler for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. Accordingly, the client should review both the fees charged by the funds and the fees charged by Henssler to fully understand the total amount of fees to be paid by the client. This will allow the client to evaluate the cost of the advisory services. Henssler also charges an advisory fee on any accounts invested in Mutual Funds managed by Henssler or its affiliates. This advisory fee will be in addition to the fees incurred by the client charged by the mutual fund to all shareholders of the fund. This may result in the client paying more or less fees than if the client assets were invested in an unaffiliated mutual fund or similar investment.

#### Commissions and 12b-1 Fees

Certain Henssler management personnel and other related persons may be licensed as a registered representative of an unaffiliated broker-dealer and/or licensed as insurance agents or brokers. In this separate capacity, these individuals are able to implement investment recommendations for advisory clients for separate and typical compensation (i.e., commissions, 12b-1 fees or other sales-related forms of compensation). This presents a conflict of interest to the extent the individual recommends that a client invest in a security which results in a commission being paid to that individual. Clients are not under any obligation to

engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the client's discretion.

For more information about affiliated entities and brokerage practices see Item 10 and Item 12 of this brochure.

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

Henssler generally 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). In some cases, however, Henssler affiliates may enter into performance fee arrangements with Qualified Clients, and these fees are subject to individualized negotiation with each client. The Henssler affiliate will structure any performance or incentive fee arrangement subject to Section 205(a)(1) of the Investment Advisors Act of 1940 in accordance with the available exemptions thereunder, including the exemption set forth in Rule 205-3. In measuring clients' assets for the calculation of performance-based fees, the Henssler affiliate shall include realized and unrealized capital gains and losses. Performance based fee arrangements may create an incentive for Henssler or its affiliates to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor higher fee-paying accounts over other accounts in the allocation of investment opportunities. Henssler has procedures designed and implemented to ensure that all clients are treated fairly and equally, and to prevent this conflict from influencing the allocation of investment opportunities among clients.

## <u>Item 7 – Types of Clients</u>

GWH provides portfolio management services to individuals, high-net-worth individuals, corporate pension and profit-sharing plans, charitable institutions, foundations, endowments, trust accounts, and other U.S. and international institutions. In addition to the types of clients GWH services, HAM also provides advisory services to municipalities and a registered mutual fund. Henssler is always interested in expanding its client base and will consider taking on additional types of clients based upon the situation.

### Item 8 - Methods Of Analysis, Investment Strategies And Risk Of Loss

Henssler's Fundamental Investment Philosophy—The Ten Year Rule

Henssler works with a simple, yet comprehensive financial planning strategy called the Ten Year Rule. The basis for our Ten Year Rule is:

- Henssler believes it is imprudent for an investor to be forced to sell equity investments during a period of depressed stock prices in order to generate funds to cover spending needs.
- Henssler finds that many investors are either too conservative or too aggressive with their financial asset allocation.

The Henssler philosophy is that any money a client needs within 10 years should be invested in fixed income securities, and any money not needed within 10 years should be invested in high-quality, individual common stocks or mutual funds that invest in common stocks. By holding fixed-income investments to cover 10 years' worth of liquidity needs, there should be no need to sell stocks during a period of lower priced stocks. Henssler implements this philosophy by running cash flow projections for clients in programs that offer financial planning, recommending the purchase of fixed income securities to cover liquidity needs within the next 10 years, and the purchase of equities with any remaining funds.

First, for clients using the Traditional Management programs, Henssler estimates a client's liquidity needs by running cash flow projections. Liquidity needs refer to the difference between after-tax income and desired after-tax spending for any given year. The projections are based on information provided by the client, including asset values, expected sources of income and plans for retirement. These projections will help determine reasonable expectations involving a client's savings goals, desired spending in future years, and expected retirement date. Henssler runs several projections for clients to help determine which course of action will most likely allow the client to meet their financial goals. Common goals include an early retirement date, a certain desired spending level in retirement, a dream home or some other large purchase.

Next, Henssler recommends purchasing fixed-income securities to cover the client's next 10 years of liquidity needs. A money market fund or other cash equivalent is appropriate for emergency reserves, or for funds needed over the next 12 months. Henssler recommends that additional liquidity needs should be covered with the purchase of fixed-income securities with maturity dates and amounts that correspond to those needs. Henssler does not generally recommend the purchase of bond funds for Ten Year Rule funding, as the principal is not guaranteed as of any particular date.

Finally, Henssler recommends the client purchase high-quality, individual common stocks or mutual funds that invest in common stocks with any funds not needed in the next 10 years. Henssler recommends only common stocks that meet the Henssler strict financial criteria, or mutual funds that meet certain guidelines. These guidelines are discussed in detail below.

By following this strategy, the client's asset allocation will be specifically geared towards their unique needs. At Henssler this is believed to be a more effective method of determining a client's appropriate asset allocation than simply plugging a client's age into a formula. Each and every client has a unique situation, and unique needs. Henssler's approach attempts to take all available information into account when determining the appropriate stock/bond mix. Due to the unique needs of each client, ultimately the client's risk tolerance will drive the appropriate asset allocation and investment horizon. Therefore, some clients may have a longer or shorter version of the Ten Year Rule.

#### Ten Year Rule Recap:

- Any money you believe you will need within the next 10 years should be invested in fixed-income investments.
- Money not needed within 10 years should be invested in growth investments.
- If you determine you will need funds within 10 years, begin to prepare a plan to exit stocks and buy bonds to cover these
  needs.
  - Begin selling stocks when market conditions improve;
  - Flexibility: 10 years before you need funds;
  - Set a target for a stock market index you follow, and
  - Whenever the market reaches that target, move forward with your plan to sell stocks.

#### Henssler's Method of Investment Analysis

Henssler employs a carefully conceived screening process seeking maximum growth with minimum risk for our clients through their individual portfolios.

Henssler's research department develops portfolios that include or use individual stocks, bonds, mutual funds, exchange-traded funds and separate account managers. While Henssler uses model portfolios as a guideline for client accounts, all client accounts are treated individually. These models can be modified to customize a portfolio suited for each client.

#### **Individual Common Stocks**

Henssler purchases high-quality, individual common stocks that are generally rated at least "A" by Value Line for financial strength, "A-" by Standard & Poor's for earnings and dividend quality, or "2" by Value Line for safety. The greatest risk to many clients' portfolios is the potential bankruptcy of any company whose stock they hold. Our firm's strategy is to use established stock ratings to guide purchases, and therefore, minimize client risk.

#### Standard & Poor's Earnings & Dividend Rank

**Below Average** 

This is S&P's computerized measure of common stocks based mainly on 10-year earnings and dividend performance (not to be confused with S&P debt ratings). Rankings are as follows:

A+	Highest	B-	Lower
Α	High	С	Lowest
A-	Above Average	D	In Reorganization
B+	Average	NR	No ranking

#### Value Line Financial Strength Rating

This is a relative measure of financial strength of the companies reviewed by Value Line. The relative ratings range from A++ (strongest) down to C (weakest), in nine steps.

## Value Line Safety Rank

This is a measurement of potential risk associated with individual common stocks. The Safety Rank is computed by averaging two other Value Line indexes—the Price Stability Index and the Financial Strength Rating. Safety Ranks range from 1 (Highest) to 5 (Lowest). Conservative investors should try to limit their purchases to equities ranked 1 (Highest) and 2 (Above Average) for Safety.

Henssler utilizes a portfolio committee that considers many qualitative and quantitative factors to review potential investments in client accounts. While the factors used by the committee are important, the selection of investments is often more of an art than a science.

Some of the factors considered by the committee include a review of a company's average daily trading volume, a review of the subject industry's long-term growth prospects and projected earnings, as well as a company's dividend yield. We also consider the price/earnings to growth ratio, as an indicator of a stock's potential value and because it also accounts for growth.

Using these and other criteria, Henssler currently offers three model stock portfolios. Henssler may increase or decrease the number of portfolios used over time. The current models are:

- The Henssler Recommended Model Portfolio—a high quality growth and income portfolio, considered Henssler's core portfolio;
- The Henssler Equity Income Portfolio—used to generate current income with modest dividend growth over time, and
- The Henssler Small/Mid Cap Portfolio—a portfolio used to generate more exposure to small- and mid-sized companies.

#### Fixed Income or Bonds

Henssler uses fixed income investments, including U.S. government and agency bonds, municipal bonds, corporate bonds, FDIC insured certificates of deposit, and money market funds. Henssler selects fixed income investments based upon the maturity date, interest rate and credit worthiness ratings from Moody's and Standard & Poor's. Henssler performs a fundamental analysis of each entity in order to reasonably ensure the payment of interest and the ultimate repayment of principal. Henssler does not have a model bond portfolio.

## **Mutual Funds**

Henssler may also recommend that clients invest in mutual funds. Henssler suggests mutual fund portfolios to supplement a client's allocation in a particular area or industry. Henssler may also use a mutual fund portfolio when a client's account does not have sufficient funds to be properly diversified with individual securities. Finally, a mutual fund portfolio may be used if a client feels more comfortable investing in mutual funds rather than owning individual stocks.

In searching for high quality mutual funds, Henssler reviews a fund's Morningstar rating, which takes into account performance and risk. We also consider the fund manager's tenure to ensure the fund's performance can largely be attributed to current fund management. We want to make sure the fund's managers are not drifting away from their stated investment style, and away from their area of expertise. We do not want a domestic large-cap manager to begin purchasing emerging markets stocks.

Because expenses affect the mutual fund's overall performance, we look for funds with expense ratios lower than their peer group. Performance concepts, such as Sharpe Ratio, a measure of risk-adjusted return, and Alpha, a measure of performance against the respective benchmark, are also considered. Finally, we consider the minimum initial investment amount required to purchase the mutual fund.

In choosing mutual funds, we focus on stable management, consistent investment style, consistent risk-based performance, and below average expenses.

#### Exchange-Traded Funds ("ETF")

Henssler may suggest the use of ETFs in a client portfolio. An ETF is a security that tracks an index, a commodity or a basket of securities unified by a particular investing theme, such as, companies whose main business is biotech. An ETF is similar to an index mutual fund, but trades like a stock on an exchange. An ETF experiences price changes throughout the day, as it is bought or sold. However, ETFs differ from traditional mutual funds in that their shares are issued, traded and redeemed.

We review ETFs to identify investments with performance that meets or exceeds the performance of their stated benchmark with low expenses and low tracking error. Manager tenure and fund longevity are also considered in the decision process. We expect our process to better identify those ETFs that perform according to their stated goal and/or closely follow their benchmark.

#### Henssler Automated Investment Management

The Program Disclosure Brochure includes a discussion of various risks associated with the Program, including the risks of investing in ETFs, as well as risks related to the underlying securities in which ETFs invest. In addition, the Program Disclosure Brochure also discusses market/systemic risks, asset allocation/strategy/diversification risks, investment strategy risks, trading/liquidity risks, and large investment risks.

#### Separate Account Managers

In our selection process for separate account managers, we review manager performance on a nominal and risk-adjusted basis relative to their stated benchmark and investment style (i.e., value, growth, large-cap, small-cap, etc.). We also review their holdings to ensure the holdings fit with the stated benchmark and investment style. Additionally, we review manager tenure to ensure this performance can be attributed to the current manager.

#### Risk of Loss

Even with Henssler's careful screening process, all investments carry risks. Investments managed by Henssler are no exception. You could lose money on your investments managed by Henssler. Accordingly, you should understand the principal risks of investing, which are described below.

Market Risk: Stock prices fluctuate in response to many factors, including changes in interest rates, the activities of individual companies and general market and economic conditions. Regardless of any one company's particular prospects, a declining stock market may produce a decline in stock prices for all companies. Stock market declines may continue for an indefinite period of time, and investors should understand that from time to time during these temporary or extended bear markets, the value of their investments may decline.

Business and Economic Risk: Often, a particular industry, or certain companies within that industry, may be affected by circumstances that have little to no impact on other industries, or other companies within that industry. For example, many industries and companies rely heavily on one type of technology. If this technology becomes outdated, or ceases to be cost-effective, industries and companies that rely on the technology may become unprofitable while companies outside the industry may not be affected at all.

Political Risk: The regulation or deregulation of particular industries may materially impact the value of companies within the affected industry. For example, if a particular sector or industry becomes subject to more or less government regulation, some companies in that sector or industry will make a successful transition into the new environment and prosper, while other companies will mismanage the process and do poorly.

Investments in Small- and Mid-Sized Companies Risk: Although Henssler recommends investments in companies of all sizes, there may be times when Henssler makes substantial investments in small and mid-sized companies. Stocks of smaller companies may have more risks than larger companies. In general, they have less experienced management teams, serve smaller markets, and find it more difficult to obtain financing for growth or potential development than larger companies. Because of these and other factors, small companies may be more susceptible to market downturns, and their stock prices may be more volatile.

Foreign Securities Risk: Investing in foreign securities involves risks that political and economic events unique to a foreign country or region will affect those markets and their issuers. These events will not necessarily affect the U.S. economy or similar issuers located in the United States. In addition, investments in foreign countries are generally denominated in a foreign currency. As a result, changes in the value of those currencies compared to the U.S. dollar may affect (positively or negatively) the value of your

investments. These currency movements may happen separately from and in response to events that do not otherwise affect the value of the security in the issuer's home country.

Portfolio Turnover: Portfolio turnover measures the rate at which the securities in a portfolio change during any given year. Portfolio turnover involves expense to an investor in the form of brokerage commissions and other transaction costs, which may adversely impact performance. Additionally, an increase in portfolio turnover may result in an increase or decrease in taxable gain or loss attributable to an investor. Due to the more volatile nature of small and mid-sized companies, the Henssler Small/Mid Cap Portfolio described above has a significantly higher turnover ratio than the other portfolios offered by Henssler

## <u>Item 9 – Disciplinary Information</u>

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Henssler or the integrity of Henssler's management. Henssler has no information applicable to this Item.

## Item 10 - Other Financial Industry Activities and Affiliations

Henssler is affiliated with certain other entities and individuals, as well as being involved with certain industry activities, which could involve a conflict of interest between Henssler and its clients. The activities and affiliations that could cause such conflicts and the how those conflicts are addressed are listed below.

GWH is the adviser to The Monteagle Opportunity Equity Fund ("The Fund"), an investment company registered under the Investment Company Act of 1940. Henssler may recommend that clients purchase shares of mutual funds managed by the firm or an affiliate. For example, The Fund is primarily invested in small- and mid-cap stocks. To the extent a portion of the client's assets are allocated to positions in small- or mid-cap stocks, Henssler may recommend that clients invest that allocation in The Fund. This could present a conflict of interest and clients are made aware of this conflict. Henssler may include the value of any related fund in the client's account balance in calculating its advisory fees. Additionally, in their contract describing the services provided, clients are informed and acknowledge the potential for conflict of interest among the related parties.

Dr. Gene and other staff members host a talk radio show, "Money Talks," on a local radio station that airs on Saturdays and Sundays. The show provides information on various investment topics. The investment information provided during this radio show is not designed to meet the needs of each individual participant or listener. The show is designed to provide participants and listeners with discussion on general investment topics.

Lighthouse Insurance Agency, LLC was renamed to Henssler Insurance, LLC ("HI") in 2014. Henssler Insurance continues to offer the same services Lighthouse offered in the past such as selling advertisements that air during Dr. Gene's radio show. As before, Henssler may recommend that clients utilize the services offered by the companies that purchase these advertisements. Henssler and its other affiliates do not receive direct compensation for these referrals; only HI receives revenue that is directly related to the advertisements purchased. Henssler also routinely recommends the services of businesses that do not purchase advertising on the radio show. HI is owned by Dr. Gene and William G. Lako, Jr., Henssler's Managing Director and Principal.

In addition to the services previously offered by Lighthouse, Henssler Insurance also offers additional insurance services, such as life insurance, long-term care insurance, disability insurance and fixed-annuity products. Henssler's financial planners may receive compensation from HI's insurance sales, and Henssler principals and affiliates, through their ownership of HI, have a financial interest in a client using HI's services—creating an inherent conflict of interest. However, no Henssler client is obligated to use HI for any services. Obtaining services from HI will not result, directly or indirectly, in the payment of any greater or lesser investment advisory fees or expenses assessed by Henssler to its investment advisory clients. Additionally, certain employees of Henssler and/or HI may maintain a relationship with an unaffiliated broker-dealer for purposes of receiving commissions on previously sold insurance-related security products (such as variable annuities and indexed annuities). HI may offer these types of products to the general public and/or Henssler clients and may receive commissions for the sale of any such products through the unaffiliated broker-dealer. Henssler does not receive any commission-based compensation from the sale of these insurance-related security products.

HI is also a 50% owner of Henssler Norton Insurance, LLC ("HN"). HN services certain insurance products placed by an independent insurance company, Norton Insurance Agency, Inc. ("Norton"), which, through its affiliate Real Estate Insurance Network, LLC, owns the other 50% of HN. Henssler employees may refer clients that may benefit from their services to HN, HI, Norton or another insurance agency. Commissions earned by HN, Norton or another insurance company related to this insurance may be shared as a referral to HI. While Henssler does not directly receive compensation for these referrals, Henssler Principals, through

their ownership of HI, have a financial interest in a client becoming an insurance client of HN and/or Norton, creating an inherent conflict of interest. However, no Henssler client is obligated to use HN or Norton for any insurance products or services. Purchasing insurance products or services through HN or Norton will not result, directly or indirectly, in the payment of any greater or lesser fees or expenses assessed by Henssler to its investment advisory clients. Henssler also routinely recommends the services of other businesses that do not purchase insurance products through Norton or HN.

Henssler management and other personnel may act as an agent for various insurance companies. As such, these individuals are able to receive separate, yet customary commission compensation resulting from implementing product transactions on behalf of advisory clients. Clients, however, are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client. Obtaining these services will not result, directly or indirectly, in the payment of any greater or lesser investment advisory fees or expenses assessed by Henssler to its investment advisory clients.

Henssler Small Business Services, LLC ("HSBS"), a Georgia Limited Liability Company, was created in 2012 to provide business services to small businesses and Henssler Clients. HSBS may receive service or consulting fees from clients as well as referral fees from service providers to which HSBS refers clients. While Henssler and its financial planners do not directly receive compensation from HSBS' business activities, some Henssler employees and Henssler affiliates, through their ownership of HSBS, have a financial interest in a client becoming a client of HSBS, creating an inherent conflict of interest. However, no Henssler client is obligated to use HSBS for any products or services. Purchasing products or services from HSBS will not result, directly or indirectly, in the payment of any greater or lesser investment advisory fees or expenses assessed by Henssler to its investment advisory clients. HSBS is owned by Dr. Gene and Mr. William G. Lako, Jr.

Patricia T. Henssler, Treasurer of Henssler, is a Certified Public Accountant with the accounting firm, P.T. Henssler C.P.A., LLC ("PTH"). PTH is a Public Accounting Firm registered with the State of Georgia. PTH was renamed Henssler CPA's and Advisers, LLC ("HCPA") effective January 31, 2019. Henssler Financial Tax & Accounting Division ("TAD") is a division of Henssler, which provides tax and accounting services. DiLuzio & Henssler, Inc. ("DH") is an accounting firm wholly owned by Henssler. Henssler may recommend HCPA, TAD or DH to advisory clients in need of accounting and/or tax services. Accounting services provided by HCPA, TAD or DH are separate and distinct from the advisory services of Henssler, and are provided for separate and typical compensation. An all-inclusive fee may be charged for accounting and investment advice for clients. No Henssler client is obligated to use HCPA, TAD or DH for any accounting or tax services.

Christopher E. Reeves serves as Henssler's and several affiliates' Chief Compliance Officer. Mr. Reeves is a partner at Reeves Law, P.C., a law firm specializing in estate planning, business law and general litigation services. Henssler and its affiliates regularly refer advisory clients in need of such legal services to Reeves Law. Henssler does not receive compensation for making any referrals to Reeves Law, and clients are not required to utilize such services. Reeves Law, P.C., provides legal services based on an agreement directly with the client and services are performed for separate and typical compensation. Reeves Law also provides legal services to Henssler, related entities and related persons. As an attorney operating under a professional code, Mr. Reeves is required to resolve any conflicts of interest as dictated by the Georgia Rules of Professional Conduct.

Henssler participates in programs with CSC, Fidelity Investments ("Fidelity") and TD/Ameritrade ("TDA"), as discussed more fully in Item 12 – Brokerage Practices below. While there is no direct link between the investment advice given and participation in these programs, economic benefits are received. These benefits include: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk serving participant advisers exclusively; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; ability to have investment advisory fees deducted directly from client accounts; access, for a fee (currently waived by CSC), to an electronic communication network for client order entry and account information; receipt of compliance publications; receipt of monetary benefits for marketing, technology or other expenses, and access to mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors.

Henssler also participates in a referral program with other businesses related to the referral of clients to those other businesses. Henssler or its affiliates may receive a benefit from these businesses upon the referral of a client who chooses to use the service. By way of example, one such business is Automatic Data Processing ("ADP"). Henssler may refer a client to use ADP for payroll processing services. If a client chooses to use ADP's payroll processing services, ADP may pay Henssler or its affiliates a referral fee for any successful referral. Henssler thus has a direct interest in a client using the services of ADP or another referral source, creating a conflict of interest. However, no Henssler client is obligated to use ADP or any other business referred to the client by Henssler. Using these referred products or services will not result, directly or indirectly, in the payment of any greater or lesser fees or expenses assessed by Henssler to its investment advisory clients. Henssler also routinely recommends the services of other businesses that do not provide Henssler with referral fees.

LHLR Group, LLC ("LHLR"), a Georgia Limited Liability Company, was created in 2012 to serve as a manager of certain real estate investments held by Henssler Clients. LHLR was renamed Henssler Capital, LLC ("HC") effective May 31, 2017. HC receives a management fee from the Clients it serves and may also receive a performance fee for the investments managed by HC. While Henssler does not receive direct compensation from investments separately managed by LHLR, Henssler affiliates may receive compensation by virtue of their ownership in HC. HC is owned by Dr. Gene, Mr. William G. Lako, Jr., Mr. Christopher E. Reeves, and SPMK II, LLC.

New Millennium Property Management, LLC ("NMPM"), a Georgia Limited Liability Company, was created in 2012 to provide property management services to Henssler affiliates, Henssler Clients, and other real property owners. NMPM was renamed Henssler Property Management, LLC ("HPM") effective May 31, 2017. HPM receives management, maintenance and leasing and referral fees from its clients. While Henssler does not directly receive compensation from HPM's business activities, Henssler affiliates, through their ownership of HPM, have a financial interest in a client using HPM's services, creating an inherent conflict of interest. However, no Henssler client is obligated to use HPM for any services. Obtaining services from HPM will not result, directly or indirectly, in the payment of any greater or lesser investment advisory fees or expenses assessed by Henssler to its investment advisory clients. HPM is owned by Dr. Gene, Mr. William G. Lako, Jr., Mr. Christopher E. Reeves and SPMK II, LLC.

Henssler Real Estate Fund I, LLC ("HREF I"), a Georgia Limited Liability Company, was formed in 2013 for the purpose of offering certain clients the opportunity to invest in a private fund targeting investments in existing multi-family and single-family residential real property primarily located in the southeastern and south-central United States. HC serves as HREF I's sponsor and managing member. HC receives management fees from HREF I, and may also receive a performance fee, for the investments managed by HC in HREF I. The sale of interests in HREF I may only be accomplished by the HREF I offering documents, which documents contain the full details and disclosures related to the offering and operation of HREF I.

Henssler Real Estate Fund II, LLC ("HREF II"), a Georgia Limited Liability Company, was formed in 2015 for the purpose of offering certain clients the opportunity to invest in a private fund targeting investments in existing multi-family and single-family residential real property primarily located in the southeastern and south-central United States. HC serves as HREF II's sponsor and managing member. HC receives management fees from HREF II, and may also receive a performance fee, for the investments managed by HC in HREF II. The sale of interests in HREF II may only be accomplished by the HREF II offering documents, which documents contain the full details and disclosures related to the offering and operation of HREF II.

Henssler Real Estate Fund III, LLC ("HREF III"), a Georgia Limited Liability Company, was formed in 2017 for the purpose of offering certain clients the opportunity to invest in a private fund targeting investments in existing multi-family and single-family residential real property primarily located in the southeastern and south-central United States. HC serves as HREF III's sponsor and managing member. HC receives management fees from HREF III, and may also receive a performance fee, for the investments managed by HC in HREF III. The sale of interests in HREF III may only be accomplished by the HREF III offering documents, which documents contain the full details and disclosures related to the offering and operation of HREF III.

## Item 11 - Code of Ethics

Henssler adopted a Code of Ethics for all supervised persons of the firm describing Henssler's high standard of business conduct, as well as Henssler's fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Henssler must acknowledge the terms of the Code of Ethics annually, or as amended.

Henssler's employees and persons associated with Henssler are required to follow Henssler's Code of Ethics. Subject to satisfying this policy and applicable laws, Henssler's officers, directors and employees may trade for their own accounts in securities which are recommended to and/or purchased for Henssler's clients. The Code of Ethics is designed to ensure that the personal securities transactions, activities and interests of Henssler's employees will not interfere with making and implementing decisions that are in the best interest of advisory clients. The Code is designed to allow employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of Henssler's clients. In addition, under certain circumstances, the Code requires pre-clearance of personal securities transactions, and may restrict trading in close proximity to client trading activity.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Henssler's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. Henssler will retain records of the trade order specifying each participating account and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated

as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

All Access Persons must submit initial, quarterly and annual reports of all applicable brokerage accounts and holdings, as well as duplicate trade execution confirmations and monthly statements or otherwise affirm all transactions made during the previous quarter. All Covered Securities Transactions are subject to policies and procedures established to mitigate conflicts of interest. Supervised persons are prohibited from participating in any Initial Public Offerings and may not engage in short-term trading without an exemption. Violations of the Code of Ethics may result in various sanctions, including possible termination. However, clients should be aware that no set of rules or procedures could possibly anticipate or relieve all potential conflicts. For a copy of the Code of Ethics, please contact Henssler's Chief Compliance Officer, Christopher E. Reeves at (770) 429-9166 or creeves@henssler.com.

## **Item 12 - Brokerage Practices**

#### Discretion vs. Non-Discretion

Henssler manages accounts on a discretionary basis, as well as a non-discretionary basis, which are subject to client-imposed limitations and goals. The nature of services provided to the client establishes whether Henssler has discretion to determine the securities to be bought or sold, the amount of securities to be bought or sold, the broker-dealer to be used, and the commission rate paid. The extent to which Henssler exercises its discretion is set forth in the client service agreement.

Henssler has the discretion to determine which broker-dealer will be used for the client accounts to execute trades. Henssler tries to select broker-dealers that will provide the best services at reasonable commission rates. The reasonableness of commissions is based on the broker's ability to provide professional services, competitive commission rates, research, and other services, which will help Henssler in providing investment management services to clients. Henssler may recommend or use a broker-dealer who provides useful research and securities transaction services, even though a different broker-dealer, who offers no research services and minimal securities transaction assistance, may charge a lower commission. Research services may be useful in servicing all of Henssler's clients, and not all of such research may be useful for the account in which the particular transaction was made.

Henssler's primary consideration in selecting a broker-dealer is its ability to provide the most favorable price and execution. In making this determination, Henssler will consider price, financial strength and responsibility, and the full range and quality of a broker-dealer's services. Examples of these types of services include written and oral economic and market advice. This advice may include the advisability of purchasing or selling certain securities, the availability of securities or purchasers or sellers of securities, analyses and reports concerning issuers, industries, securities, economic factors and trends, and portfolio strategy.

#### **Custodial Services**

Henssler participates in several institutional service programs designed for Registered Investment Advisers and their clients. CSC, Fidelity and TDA offer these programs. Schwab Advisor Services ("SAS") is a program of CSC. Fidelity Institutional Advisers Group ("FIAG") is the program offered by Fidelity. Clients in need of custodial services will generally have SAS, FIAG, or TDA (collectively referred to herein as "Custodians") recommended to them. However, it is ultimately within the client's sole decision as to the custodian they choose to hold their assets.

In addition to our portfolio management and other services, the Henssler Automated Investment Management Program includes the brokerage services of CSC, a broker-dealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. While clients are required to use CSC as custodian/broker to enroll in the Program, the client decides whether to do so and opens its account with CSC by entering into an account agreement directly with CSC. We do not open the account for the client. If the client does not wish to place his or her assets with CSC, then we cannot manage the client's account through the Program. As described in the Program Disclosure Brochure, SWIA may aggregate purchase and sale orders for ETFs across accounts enrolled in the Program, including both accounts for our clients and accounts for clients of other independent investment advisory firms using the Program.

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. Through SAS, CSC provides us and our clients, both those enrolled in the Program and our clients not enrolled in the Program, with access to its institutional brokerage services—trading, custody, reporting and related services—many of which are not typically available to CSC retail customers. CSC also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. CSC's support services described

below are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The availability to us of CSC's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients. Here is a more detailed description of CSC's support services: CSC's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. CSC's services described in this paragraph generally benefit the client and the client's account.

CSC also makes available to us other products and services that benefit us but may not directly benefit the client or its account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at CSC. In addition to investment research, CSC also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping and client reporting.

CSC also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession;
- · marketing and other financial assistance; and
- access to employee benefits providers, human capital consultants and insurance providers.

CSC may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. CSC may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. CSC may also provide us with other benefits such as occasional business entertainment of our personnel.

Similar benefits may be provided to us by other custodians used to hold client assets.

As a result of its participation in the various programs described herein, Henssler receives some additional benefits. (Please refer to Item 10 – Other Financial Industry Activities and Affiliations above.) Additionally, some custodial platforms available to clients (for example, CSC) have an asset-based pricing structure that includes all transaction fees associated with trading in the client accounts. A client who chooses such a custodian should determine if the custodian's fee would exceed the aggregate cost of such services if they were to be contracted and paid for separately by the client. When determining this, the client should consider the level of fees charged by such custodian, the amount of portfolio activity in the client's account, and the value of services available by the custodian or its affiliates, among other factors. Additionally, if a client chooses a custodian with an asset-based pricing structure, all trades placed with that custodian will be executed by that custodian. Henssler cannot choose the broker-dealer for trades executed in these asset-based custodial accounts.

#### **Directed Brokerage**

Many clients, when undertaking an advisory relationship, already have a pre-established relationship with a broker. They may instruct Henssler to execute all transactions through that broker. In the event that a client directs Henssler to use a particular broker or dealer, it should be understood that under those circumstances Henssler would not generally attempt to negotiate commissions. Obtaining volume discounts and best execution may not be possible. Under these circumstances, a disparity in commission charges may exist with respect to the commission charged to other clients. If Henssler believes that the use of one particular broker designated by the client will interfere with Henssler's ability to manage accounts, Henssler may decline to enter into an advisory agreement with that client. Depending on client circumstances, Henssler may recommend any of several brokers provided Henssler can meet its fiduciary obligation of best execution. The factors considered by Henssler when making this recommendation are the broker's ability to provide professional services, Henssler's experience with the broker, the broker's reputation, and the broker's financial strength, among other factors.

#### Soft Dollars

Henssler may enter into agreements to use "soft dollars" to pay for a portion of the research and brokerage related products and services used by the firm. This is the practice whereby Henssler uses a portion of client transaction cost dollars incurred with certain broker-dealers to pay for research and brokerage related products and services provided by both the subject broker-dealers as well as third parties and outside companies. This practice is referred to as a soft dollar arrangement. Henssler benefits from these soft dollar arrangements because Henssler does not have to directly pay for the research- and brokerage-related products provided. Due to this benefit, Henssler may have an incentive to select or recommend a broker-dealer based upon the soft dollar benefits received from the broker-dealer rather than for receiving the most favorable execution. For example, Henssler may use a broker-dealer that provides brokerage and research services, even though the commission or other transaction costs charged for a particular transaction may be higher than the commission another broker-dealer would have charged for executing the same transaction.

Examples of research related services used by Henssler during the last calendar quarter include various investment research reports and statistical services such as Thomson Financial Attribution and Analytics research reports, Morningstar research reports, Value Line Research Center Analyzer research reports, NYSE research and trading reports, Standard and Poor's research reports, Tamarac portfolio management software and services, Bloomberg research services, Moody's Analytics research reports and Economy.com research services.

Research- and brokerage-related products and services received by Henssler from soft dollar arrangements may be useful in servicing some or all of Henssler's clients. However, not all or any of such product or service may be useful for the client account for which the particular transaction is made. Some soft dollar services and products provided may be used for both research and non-research purposes. In these circumstances, an appropriate allocation is made of the proportion of the cost attributable to non-research purposes, which is paid directly by Henssler.

#### **Trade Aggregation**

On occasions when Henssler deems the purchase and sale of a security to be in the best interests of more than one of its clients, Henssler may aggregate multiple client purchase or sell orders that occur during the same time into a block order for execution. Executed orders are allocated among participating accounts according to each account's pre-determined participation in the transaction. Client accounts for which orders are aggregated receive the average price of such transaction, which could be higher or lower than the price that would otherwise be paid by a client absent the aggregation. Any transaction costs incurred in the transaction will be shared pro rata based on each client's level of participation in the transaction.

#### **Trade Error Policy**

It is Henssler's obligation to correctly place orders for its advisory clients. If Henssler commits a trading or administrative error in a discretionary advisory account, upon notice of such error, the Operations Department, with assistance from the Compliance Department, conducts a full review of the facts and recommends the appropriate action. Corrective actions are based on the facts and circumstances of each error on a case-by-case basis. Henssler will correct the error in a manner that it deems appropriate, provided that Henssler will ensure that the discretionary client does not suffer any adverse financial consequences from such error. For non-discretionary advisory accounts, Henssler conducts the same review and correction process as long as that the trading or administrative error is discovered by Henssler or otherwise brought to Henssler's attention within 60 days after the client receives notice of the subject error.

Pursuant to the above terms, the firm will not correct a trade error by passing the cost (including losses) to clients or by using soft dollars. On a limited basis, Henssler may correct a trade error by transferring the investment involved in the trade error to an affiliated account or to another client account, if it is determined that the transaction is suitable and in the best interest of both clients. Neither Henssler nor any affiliate is acting as a broker in these transactions and neither Henssler nor any affiliate receives any benefit therefrom. Generally, if related trade errors result in both gains and losses in a client account, they may be netted.

For accounts held at Charles Schwab & Co., Inc., if an investment gain results from correcting trade, the gain will remain in your account unless the same error involved other client account(s) that should have received the gain, it is not permissible for you to retain the gain, or we confer with you and you decide to forego the gain (for example, because of tax reasons). If the gain does not remain in your account, Schwab will donate the amount of any gain \$100 or more to charity. Schwab will maintain the loss or gain (if such gain is not retained in your account) if it is under \$100 to minimize and offset its administrative time and expense.

At Fidelity and TD Ameritrade, all corrected trades are cleared through an error account. Henssler reimburses all losses to a client because of a trade error. At TD Ameritrade, any losses in the error account are offset by any gains in the account on a daily basis. If any gains remain after they are netted daily, those gains are donated to the American Red Cross or another 501(c)(3) charity. Because the losses and gains in the error account are netted on a daily basis, Henssler or another client at Fidelity or TD Ameritrade may receive a benefit from this arrangement.

#### **Agency Cross Transactions**

It is Henssler's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Henssler will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer. Henssler is not dually registered.

### **Step-Out Transactions**

Henssler may, on occasion, instruct the executing broker to credit a portion of a block trade to another broker, a common practice known as a step out. Generally, this may occur when numerous allocations are blocked into one single trade order, whereas one or more of the clients participating in the block may have placed trade direction to one or more brokers other than the executing broker. A step out, in this case, allows Henssler's traders to block a trade order where all participating allocations receive the same price and facilitates specific client direction to trade with a specified broker(s). No client is disadvantaged by means of a step out.

#### Item 13 - Review of Accounts

Associates and other investment personnel (including administrative personnel designated and supervised by investment personnel) review each client's investment portfolio on a regular basis to ensure that investments are made in conformity with client's stated objectives. Each managed client receives an Investment Policy Statement ("IPS"). The IPS is based on their current situation and the allocation of their accounts. When a client's financial plan or financial situation changes, Henssler will update the IPS as necessary.

Associates present each managed client's documentation to management for review on a regular basis. During the review, the Associate presents information that may include the following areas: Overview of client current situation; Date of the last client meeting; Assets under management; and Percentage of client assets managed.

As appropriate, the Associate also presents a review of the financial plan, IPS, client goals sheet, asset allocation, liquidity plan, performance, income, savings and spending, college planning, insurance, estate planning, tax and accounting needs.

Trading activity for each client account is reviewed for accuracy and appropriateness. Generally, unless the client dictates more or less frequent meetings, Associates meet with each client on an annual basis to review goals, objectives, holdings, and portfolio performance to ascertain the continued appropriateness of the client's investment strategy. Generally, clients receive confirmation of purchase and sale transactions. On a monthly or quarterly basis, reports are sent to clients from their custodians that show transactions for the period, as well as portfolio holdings. Written performance reports and appropriate commentary are provided by Henssler on a semiannual or annual basis.

For the Henssler Automated Investment Management Program, Henssler Financial constructs the range of available portfolios and invest any Program assets in accordance with and based upon a client's responses to the Program questionnaire. The Account will be structured to meet the Client's financial requirements, investment objectives and risk tolerances as communicated in the Program questionnaire. At our direction, SWIA will use software to automatically trade and rebalance the portfolio if it drifts from the targeted asset allocation by a defined amount. Other than determining the appropriate ETF portfolio, based upon the Client's Program questionnaire responses, Henssler Financial does not actively review the investments held by the client in the Program. It is the Client's responsibility to notify Henssler Financial in writing of any investment policies or restrictions applicable to the Client as well as any subsequent changes to Client's financial condition or investment objectives.

## <u>Item 14 – Client Referrals and Other Compensation</u>

Henssler may enter into written agreements with individuals or firms, both affiliated and unaffiliated (each, a "Referral Partner"), who are not disqualified pursuant to Rule 206(4)-3 under the Investment Advisers Act of 1940, as amended (the "Advisers Act"). The written agreements entered into between Henssler and each Referral Partner shall:

- Describe the referral activities to be performed by the Referral Partner on behalf of Henssler, and
- Require the Referral Partner to provide each potential or current client with a copy of Henssler's brochure required by Rule 204-3 of the Advisers Act.

The agreement with a Referral Partner must also provide each potential or current client with a separate written disclosure document that provides:

- The name of the Referral Partner;
- The nature of the relationship of the Referral Partner with Henssler;
- A description of the compensation to be paid by Henssler to the Referral Partner, typically a percentage of the investment advisory fees paid to Henssler by the referred client, and
- A statement that no additional fee will be charged to the client in order to compensate the Referral Partner.

Henssler may also compensate its employees for obtaining new business. This additional compensation rewards Henssler's employees for the extra time, effort and expense involved in establishing a new client relationship. Henssler may employ individuals solely for the purpose of obtaining new business. This compensation does not increase the clients' fees.

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

## Item 15 – Custody

Henssler has the ability to have its advisory fee for each client debited by the custodian on a quarterly basis. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from their chosen broker-dealer, bank or other Qualified Custodian. Henssler may also provide a written periodic report summarizing account activity and performance.

Under government regulations, we are deemed to have custody of a client's assets if the client authorizes us to instruct the Custodians to deduct our advisory fees directly from the client's account. This is the case for accounts in the Program. the Custodians maintain actual custody of clients' assets. Clients receive account statements directly from the Custodians at least quarterly. They will be sent to the email or postal mailing address the client provides to the Custodians. Clients should carefully review those statements promptly when received. We also urge clients to compare the Custodians' account statements to the periodic account statements clients receive from us. Statements from Henssler may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Clients should contact Henssler if they feel there are unexplained discrepancies between their quarterly statements and any statement received from Henssler.

Although Henssler does not offer custody services for clients directly as a Qualified Custodian, Henssler may provide certain services that can cause Henssler to be deemed to have custody of client assets, such as where Henssler and/or an affiliated entity or person is provided a general power of attorney or otherwise has access to the client's investment assets. Henssler requires each client's funds (including those over which Henssler may be deemed to have custody) to be maintained at a Qualified Custodian that sends at least quarterly account statements to the client or the client's designated representative. Copies of account statements are also sent to Henssler and available to Henssler electronically. Henssler forms a reasonable belief based on the availability of these statements that the Qualified Custodian provides account statements directly to clients at least quarterly. In addition, Henssler is subject to a surprise audit by an independent auditor at least once annually with respect to accounts for which Henssler is deemed to have custody.

#### Item 16 - Investment Discretion

Henssler usually receives discretionary authority from the client at the beginning of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Henssler observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, Henssler's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to Henssler in writing.

## **Item 17 - Voting Client Securities**

As a matter of firm policy and practice, Henssler generally does not have any authority to and does not vote proxies on behalf of advisory clients, although Henssler may, in rare circumstances and at its discretion, accept voting responsibility on behalf of other clients. Outside of accepting that responsibility, clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Henssler may provide advice to clients regarding the clients' voting of proxies. Henssler has the fiduciary obligation, when it has voting authority, to place the best interest of advisory clients (plan participants and beneficiaries in the case of ERISA accounts) as the sole consideration when voting proxies of portfolio companies.

Henssler's established proxy voting procedures include the formation of a Proxy Committee. The Proxy Committee shall consider its fiduciary responsibility to all clients when addressing proxy issues and vote accordingly, taking into account general policies. If a material conflict of interest arises between Henssler's interests and those of the clients concerning proxy voting, Henssler will adhere to recommendations or use third-party advisers. Henssler will ensure that all voting records, research analysis, client requests and other information shall be maintained in accordance with applicable books and records rules and regulations.

Inquiries regarding Henssler's proxy procedures and/or voting records should be directed to your Henssler Associate.

As it relates to the Program, and as described in the Program Disclosure Brochure, clients enrolled in the Program designate SWIA to vote proxies for the ETFs held in their accounts. We have directed SWIA to process proxy votes and corporate actions through and in accordance with the policies and recommendations of a third party proxy voting service provider retained by SWIA for this purpose. Additional information about this arrangement is available in the Program Disclosure Brochure. Clients who do not wish to designate SWIA to vote proxies may retain the ability to vote proxies themselves by signing a special CSC form available from us.

#### Item 18 - Financial Information

Registered investment advisers are required in Item 18 – Financial Information to provide you with certain financial information or disclosures about Henssler's financial condition. Henssler has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

## Form ADV Part 2B Brochure Supplement

#### **Brochure Supplement**

This Part 2B of Form ADV ("Brochure Supplement") provides information about each of Henssler's employees who formulate investment advice and have discretionary authority over Client assets or direct Client contact ("Supervised Persons").

#### **Supervised Persons**

\*Gene Willie Henssler, Ph.D.

\*William George Lako, Jr., CFP®1 Hillary Henry

\*Jennifer Jones Thomas, CFP®1 Jacob Ashford Keen

\*Troy Lynn Harmon, CFA<sup>2</sup>, CVA<sup>3</sup> \*Claudia Suzanne Lako

Daniel Adams \*Adam Edgar Lamar Ledbetter, CFP®1

\*Zachary Matthew Alexander, BFA™<sup>4</sup> \*Peter Alan Lynch

Nicholas Joseph Antonucci, CVA<sup>3</sup>, CEPA<sup>5</sup> Erica Leigh Martin

Giuliana Barbagelata \*Travis Jarrett McKenzie, CFP®1, CWS®6

\*Donald James Barker, CWS®6 Clay Norman

\*Scott Aron Brown, CFS<sup>®7</sup> \*Karl Canty Smith, CFP<sup>®1</sup>, CEPA<sup>5</sup>

Chloe Crist Adam Stadalius

\*Thomas Logan Daniel, CFP®1, CRPC®8 \*Shawna Lynn Theriault, CPA9, CFP®1,

CDFA®10

Kenneth James Duckett, CWS<sup>®6</sup> \*Justin Jacob Wagner, AIF<sup>®11</sup>

\*Michael Anthony Griffin, CFP®1 Joshua Paul Weidie, CWS®6

Lindsey Hartrampf Melanie Eischeid Wells, CFP®1

#### Firm Name and Address

## **Henssler Financial**

3735 Cherokee Street • Kennesaw, GA 30144 phone: 770-429-9166 • fax: 770-428-3852 www.henssler.com

This brochure supplement provides information about the Supervised Persons of Henssler that supplements the G.W. Henssler & Associates, Ltd. and Henssler Asset Management, LLC Brochure. You should have received a copy of those brochures. The brochures for G.W. Henssler & Associates, Ltd. and Henssler Asset Management, LLC may be requested by contacting Henssler's Media Coordinator at (770) 429-9166 or by email at adv@henssler.com.

\*Additional information about this supervised person is available on the SEC's website at www.adviserinfo.sec.gov.

Our current brochure is also available on our website www.henssler.com, free of charge.

- <sup>1</sup> See Appendix A-1 of this Supplement for information about the qualifications required to obtain and maintain the Certified Financial Planner™ ("CFP®") designation.
- <sup>2</sup> See APPENDIX A-1 of this Supplement for information about the qualifications required to obtain and maintain the Chartered Financial Analyst ("CFA") designation.
- <sup>3</sup> See APPENDIX A-2 of this Supplement for information about the qualifications required to obtain and maintain the Certified Valuation Analyst ("CVA") designation.
- <sup>4</sup> See APPENDIX A-4 of this Supplement for information about the qualifications required to obtain and maintain the Behavioral Financial Advisor™ ("BFA™") designation.
- <sup>5</sup> See Appendix A-4 of this Supplement for information about the qualifications required to obtain and maintain the Certified Exit Planning Advisor® ("CEPA®") designation.
- <sup>6</sup> See APPENDIX A-5 of this Supplement for information about the qualifications required to obtain and maintain the Certified Wealth Strategist® ("CWS®") designation.
- <sup>7</sup> See APPENDIX A-6 of this Supplement for information about the qualifications required to obtain and maintain the Certified Fund Specialist® ("CFS®") designation.
- <sup>8</sup> See APPENDIX A-6 of this Supplement for information about the qualifications required to obtain and maintain the Chartered Retirement Planning Counselor<sup>SM</sup> ("CRPC®") designation.
- <sup>9</sup> See APPENDIX A-7 of this Supplement for information about the qualifications required to obtain and maintain the Certified Public Accountant ("CPA") designation.
- <sup>10</sup> See APPENDIX A-8 of this Supplement for information about the qualifications required to obtain and maintain the Certified Divorce Financial Analyst® ("CDFA®") designation.
- <sup>11</sup>See APPENDIX A-8 of this Supplement for information about the qualifications required to obtain and maintain the Accredited Investment Fiduciary® ("AIF®") designation.

Name: Gene Willie Henssler, Ph.D.

Title: Principal and Director D.O.B. March 6, 1940

Education: Wayne State University Bachelor of Science, Business Administration, Finance, 1963

University of Michigan, Master of Business Administration, Finance, 1965

University of Michigan, Doctorate, Finance, 1971

Business Principal, President, G.W. Henssler & Associates, Ltd., 1/87 – present

Member, Henssler Asset Management, LLC, 2/98 – present

Partial Owner, CNT Financial, LLC, 10/00 - 3/10

Professor of Finance, Kennesaw State University, 9/86 – 9/96

Series 65

Disciplinary Information: None (100% clean record)

Other Business Activities: Member, Henssler Small Business Services, 10/12 – present

Member, Henssler Property Management, 8/12 - present

Member, Henssler Capital, LLC, 2/12 - present

Owner and Member, Henssler Insurance, LLC, 5/01 – present

Director, The Henssler Funds, Inc., 2/98 – 06/19

Additional Compensation: None (Not Applicable)

Supervision: Gene W. Henssler, Ph.D., is the president and owner of Henssler, and consequently there is no

chain of command from a standpoint of supervision of client advice.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: William George Lako, Jr., CFP®

Title: Principal and Managing Director

D.O.B. October 13, 1970

Education: DeKalb Community College, Associates Degree, Business, 1993

Kennesaw State University, Bachelor of Business Administration, Finance, 1995

CERTIFIED FINANCIAL PLANNER™ Certificant, 2005

Series 65

Business Principal, G.W. Henssler & Associates, Ltd., 12/98-present

Managing Director, G.W. Henssler & Associates, Ltd., 10/98 – present Operations Manager, G.W. Henssler & Associates, Ltd., 9/97 – 10/98

Associate, G.W. Henssler & Associates, Ltd., 4/95 – 10/98 Member, Henssler Asset Management, LLC, 1/02 – present

Managing Director, Henssler Asset Management, LLC, 2/98 – present

Board Member, CNT Financial, LLC, 1/01 – 3/10

Disciplinary Information: None (100% clean record)

Other Business Activities: Managing Member, Henssler Small Business Services, 10/12 – present

Managing Member, Henssler Property Management, 8/12 - present

Member, Henssler Capital, LLC, 2/12 - present

Owner and Member, Henssler Insurance, LLC, 5/01 - present

Officer, The Henssler Funds, Inc., 2/98 - 6/19

Executive in Residence, Kennesaw State University, 3/11 – present

Additional Compensation:

None (Not Applicable)

Supervision:

Gene W. Henssler, Ph.D., is the direct supervisor for William G. Lako, Jr., CFP®, and monitors his work on a daily basis. Together they sit on the Portfolio Committee to build the various

investment models at Henssler.

Requirements for State-Registered Advisers:

None (Not Applicable)

Jennifer Jones Thomas, CFP® Name:

Title: Principal and Senior Managing Associate

D.O.B. July 29, 1965

Education: CERTIFIED FINANCIAL PLANNER™ Certificant, 2005

Series 65

**Business** Principal, G.W. Henssler & Associates, Ltd., 12/98 - present

Senior Managing Associate, G.W. Henssler & Associates, Ltd., 9/94 - present

Registered Representative, Charles Schwab & Co., 10/90 – 9/94

Disciplinary Information: None (100% clean record) Other Business Activities: None (Not Applicable) Additional Compensation: None (Not Applicable)

Principal and Managing Director William G. Lako, Jr., CFP®, is the direct supervisor for Jennifer

J. Thomas, CFP®, and monitors her work on a daily basis.

Requirements for State-Registered Advisers:

Supervision:

None (Not Applicable)

Name: Troy Lynn Harmon, CFA, CVA Title: Chief Investment Officer

D.O.B. June 1, 1967

Education: Kennesaw State University, Bachelor of Business Administration, Finance, 2006

Kennesaw State University, Bachelor of Business Administration, Accounting, 2015

Chartered Financial Analyst (CFA), 2012 Certified Valuation Analyst (CVA), 2015

Chief Investment Officer, G.W. Henssler & Associates, Ltd., 8/17 – present **Business** 

Chief Investment Officer, Henssler Asset Management, LLC, 8/17 - present

Director of Research, G.W. Henssler & Associates, Ltd., 9/13 – 8/17 Director of Research, Henssler Asset Management, LLC, 9/13 - 8/17 Research Analyst, G.W. Henssler & Associates, Ltd., 8/06 – 9/13

Research Analyst, Henssler Asset Management, LLC, 8/06 – 9/13

None (100% clean record) Disciplinary Information: Other Business Activities: None (Not Applicable) Additional Compensation: None (Not Applicable)

Supervision: Troy L. Harmon, CFA, CVA, does not provide any advice to clients. However, he does work on

the investment strategy and trading operations. Chief Operating Officer Stacy Haubenschild is the direct supervisor for Harmon and monitors his work on a daily basis. Harmon is a member of the Portfolio Committee along with Gene W. Henssler, Ph.D., and William G. Lako, Jr., CFP®.

The Portfolio Committee builds the various investment models at Henssler.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Daniel Adams
Title: Financial Planner
D.O.B. December 7, 1992

Education: University of Georgia, Bachelor of Business Administration in Finance, 2016

UGA at Oxford, 2015

Business Financial Planner, G.W. Henssler & Associates, Ltd., 5/19 – Present

Financial Planner, Henssler Asset Management, LLC, 5/19 – Present Client Service Associate, G.W. Henssler & Associates, Ltd., 8/18 – 5/19 Client Service Associate, Henssler Asset Management, LLC, 8/18 – 5/19

Strategic Planning Analyst, Governor's Office of Planning and Budget, 8/17 - 8/18Constituent Services Specialist, Office of the Governor Nathan Deal, 1/17 - 8/17

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Managing Associate Donald James Barker, CWS®, is the direct supervisor for Daniel Adams,

and monitors his work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Zachary Matthew Alexander, BFA™

Title: Financial Planner
D.O.B. November 29, 1986

Education: University of Georgia, Bachelor of Science, Family Financial Planning, 2013

Behavioral Financial Advisor™, 2018

Business Financial Planner, G.W. Henssler & Associates, Ltd., 10/15 – Present

Financial Planner, Henssler Asset Management, LLC, 10/15 – Present Client Service Associate, Asset Advisors Group, LLC, 5/15 – 08/15

Advisor Assistant, AXA Advisors, LLC, 3/14 - 5/15 Intern, RTD Financial Advisors, Inc., 3/13 - 8/13

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Managing Associate Karl Canty Smith, CFP®, CEPA, is the direct supervisor for Zach Alexander,

and monitors his work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Nicholas Joseph Antonucci, CVA, CEPA

Title: Research Analyst D.O.B. May 29, 1988

Education: Kennesaw State University, Bachelor of Business Administration in Finance, 2010

Kennesaw State University, Master of Business Administration, Finance, 2015

Certified Valuation Analyst, 2016 Certified Exit Planning Advisor, 2018

Business Research Analyst, G.W. Henssler & Associates, Ltd., 11/09 – Present

Research Analyst, Henssler Asset Management, LLC, 11/09 - Present Financial Services Representative, SunTrust Bank, 6/09 - 11/09

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Chief Investment Officer Troy L. Harmon, CFA, CVA, is the direct supervisor for Nicholas J.

Antonucci, CVA, and monitors his work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Giuliana Barbagelata
Title: Financial Planner
D.O.B. January 10, 1996

Education: Kennesaw State University, Bachelor of Business Administration in Finance, 2017

Business Financial Planner, G.W. Henssler & Associates, Ltd., 1/19 – Present

Financial Planner, Henssler Asset Management, LLC, 1/19 – Present Client Service Associate, G.W. Henssler & Associates, Ltd., 1/18 – 1/19 Client Service Associate, Henssler Asset Management, LLC, 1/18 – 1/19

Finance Intern, Bryant, Carroll & Associates of Ameriprise Financial, 8/17-12/17

Receptionist/ Student Assistant, Bagwell College of Education at Kennesaw State University,

09/15 - 06/17

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Managing Associate Karl Canty Smith, CFP®, CEPA, is the direct supervisor for Giuliana

Barbagelata, and monitors her work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Donald James Barker, CWS®

Title: Managing Associate D.O.B. April 5, 1977

Education: Kennesaw State University, 2005 – 2009

Liberty University, Bachelor of Science in Criminal Justice, 2012

Certified Wealth Strategist® Certificant, 2011

Series 65

Business Managing Associate, G.W. Henssler & Associates, Ltd., 1/16 – present

Managing Associate, Henssler Asset Management, LLC, 1/16 - present

Senior Associate, G.W. Henssler & Associates, Ltd., 7/13 – 1/16 Senior Associate, Henssler Asset Management, LLC, 7/13 – 1/16

Associate, G.W. Henssler & Associates, Ltd., 10/12 - 7/13Associate, Henssler Asset Management, LLC, 10/12 - 7/13

Financial Planner, G.W. Henssler & Associates, Ltd., 6/12 - 10/12 Financial Planner, Henssler Asset Management, LLC, 6/12 - 10/12 Account Executive, G.W. Henssler & Associates, Ltd., 10/08 - 6/12 Account Executive, Henssler Asset Management, LLC, 10/08 - 6/12

Assistant, G.W. Henssler & Associates, Ltd., 10/06 - 10/08Assistant, Henssler Asset Management, LLC, 10/06 - 10/08Police Officer, Austell Police Department, 8/00 - 10/06

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Principal and Senior Managing Associate Jennifer J. Thomas, CFP®, is the direct supervisor for

D.J. Barker, CWS®, and monitors his work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Scott Aron Brown, CFS®

Title: Associate Senior Consultant

D.O.B. January 3, 1981

Education: University of Florida, Bachelor of Arts, Political Science, 2003

Nova Southeastern University, Master of Business Administration, 2005

Certified Fund Specialist®, 2010

Series 65

Business Associate Senior Consultant, G.W. Henssler & Associates, Ltd., 8/14 – present

Associate Senior Consultant, Henssler Asset Management, LLC, 8/14 – present

Client Services Manager, OneAmerica, 9/10 – 8/14 Client Relationship Manager, ING, 2/08 – 8/10

Investment Adviser Representative, ING Financial Partners, 12/05 - 12/07

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Principal and Senior Managing Associate Jennifer J. Thomas, CFP®, is the direct supervisor for

Scott A. Brown, CFS®, and monitors his work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Chloe Crist

Title: Client Service Associate
D.O.B. August 29, 1997

Education: Georgia Southern University, Bachelor of Business Administration, Financial, 2018

Business Client Service Associate, G.W. Henssler & Associates, Ltd., 6/19 – Present

Client Service Associate, Henssler Asset Management, LLC, 6/19 - Present

Teller, Ameris Bank 1/19 - 6/19

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Director

Director of Operations Adam Edgar Lamar Ledbetter, CFP®, is the direct supervisor for Chloe

Crist, and monitors her work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Thomas Logan Daniel, CFP®, CRPC®

Title: Associate
D.O.B. March 12, 1991

Education: University of Georgia, Bachelor Science in Family Consumer Sciences, Family Financial

Planning, 2013

CERTIFIED FINANCIAL PLANNER™ Certificant, 2016
Chartered Retirement Planning Counselor<sup>SM</sup>, 2017

Business Associate, G.W. Henssler & Associates, Ltd., 8/18 – present

Associate, Henssler Asset Management, LLC, 8/18 - present

Senior Financial Planner, G.W. Henssler & Associates, Ltd., 11/16 – 8/18 Senior Financial Planner, Henssler Asset Management, LLC, 11/16 – 8/18 Financial Planner, G.W. Henssler & Associates, Ltd., 10/15 – 11/16 Financial Planner, Henssler Asset Management, LLC, 10/15 – 11-16

Financial Advisor/Operations, Allen Mooney & Barnes Investment Advisors, 05/13 – 09/15

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Managing Associate Karl Canty Smith, CFP®, CEPA, is the direct supervisor for Thomas Logan

Daniel, CFP®, CRPC®, and monitors his work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Kenneth James Duckett, CWS®

Title: Senior Financial Planner

D.O.B. March 7, 1989

Education: Kennesaw State University, Bachelor of Science, Sociology, 2013

Certified Wealth Strategist® Certificant, 2018

Business Senior Financial Planner, G.W. Henssler & Associates, Ltd., 4/19 – Present

Senior Financial Planner, Henssler Asset Management, LLC, 4/19 – Present

Financial Planner, G.W. Henssler & Associates, Ltd., 2/15 - 4/19 Financial Planner, Henssler Asset Management, LLC, 2/15 - 4/19 Operations Assistant, G.W. Henssler & Associates, Ltd., 3/14 - 2/15 Operations Assistant, Henssler Asset Management, LLC, 3/14 - 2/15

Pro Shop Manager, Marietta Country Club, 8/08 – 3/14

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Managing Associate Donald James Barker, CWS®, is the direct supervisor for Kenneth Duckett,

CWS®, and monitors his work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Michael Anthony Griffin, CFP®

Title: Associate

D.O.B. January 21, 1986

Education: Kennesaw State University, Bachelor of Business Administration, Management, 2009

Oglethorpe University, Financial Planner Program, 2012

CERTIFIED FINANCIAL PLANNER™ Certificant, 2014

Business Associate, G.W. Henssler & Associates, Ltd., 11/15 – present

Associate, Henssler Asset Management, Ltd., 11/15 – present Financial Planner, G.W. Henssler & Associates, Ltd., 8/14 – 11/15 Financial Planner, Henssler Asset Management, LLC, 8/14 – 11/15

Assistant, G.W. Henssler & Associates, Ltd., 5/10 - 8/14Assistant, Henssler Asset Management, LLC, 5/10 - 8/14

Administrative Assistant, G.W. Henssler & Associates, Ltd., 5/09 - 5/10Administrative Assistant, Henssler Asset Management, LLC, 5/09 - 5/10

Office Assistant, G.W. Henssler & Associates, Ltd., 3/07 – 5/09 Office Assistant, Henssler Asset Management, LLC, 3/07 – 5/09

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Managing Associate Shawna L. Theriault, CPA, CFP®, CDFA®, is the direct supervisor for

Michael A. Griffin,  $\mathsf{CFP}^\$$  , and monitors his work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Lindsey Hartrampf
Title: Client Service Associate

D.O.B. April 20, 1994

Education: University of Georgia, Bachelor of Science, Financial Planning, 2017

Business Client Service Associate, G.W. Henssler & Associates, Ltd., 1/19 – Present

Client Service Associate, Henssler Asset Management, LLC, 1/19 – Present

Tax Staff, HC Advisors, LLC, 7/18 – 8/18

HR Assistant, Priority Payment Systems, 3/18 - 6/18

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Director of Operations Adam Edgar Lamar Ledbetter, CFP®, is the direct supervisor for Lindsey

Hartrampf, and monitors her work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Hillary Henry

Title: Financial Planner

D.O.B. September 22, 1991

Education: Mississippi State University, Bachelor of Business Administration in Management, 2014

University of Georgia | Greene Consulting, Online Financial Planner Program, Present

Business Financial Planner, G.W. Henssler & Associates, Ltd., 4/19 – Present

Financial Planner, Henssler Asset Management, LLC, 4/19 – Present Client Service Associate, G.W. Henssler & Associates, Ltd., 1/19 – 4/19 Client Service Associate, Henssler Asset Management, LLC, 1/19 – 4/19

Personal Banker, CharterBank, LLC, 1/17 – 12/18

Teller, CharterBank, LLC, 7/16 - 12/16

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Managing Associate Shawna L. Theriault, CPA, CFP®, CDFA®, is the direct supervisor for Hillary

Henry, and monitors her work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Jacob Ashford Keen
Title: Research Analyst
D.O.B. December 15, 1988

Education: Kennesaw State University, Bachelor of Business Administration, Finance, 2014

CFA Program, Level III Candidate, 2017

Business Research Analyst, G.W. Henssler & Associates, Ltd., 8/16 – present

Research Analyst, Henssler Asset Management, Ltd., 8/16 – present Research Analyst, Capital Management Advisors, 6/14 – 8/16

Research Intern, Stratus Property Group, 3/14-5/14

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Chief Investment Officer Troy L. Harmon, CFA, CVA, is the direct supervisor for Jacob A. Keen

and monitors his work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Claudia Suzanne Lako
Title: Senior Associate
D.O.B. January 20, 1974

Education: Kennesaw State University, Bachelor of Business Administration, Finance, 1997

Series 65

Business Senior Associate, G.W. Henssler & Associates, Ltd., 6/05 – present

Senior Associate, Henssler Asset Management, LLC, 6/05 - present

Associate, G.W. Henssler & Associates, Ltd., 12/97 -6/05 Associate, Henssler Asset Management, LLC, 2/98 – 6/05 Assistant, G.W. Henssler & Associates, Ltd., 5/95 – 12/97

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Principal and Senior Managing Associate Jennifer J. Thomas, CFP®, is the direct supervisor for

C. Suzanne Lako, and monitors her work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Adam Edgar Lamar Ledbetter, CFP®

Title: Director of Operations D.O.B. September 14, 1978

Education: Kennesaw State University, Bachelor of Business Administration, Finance, 2001

CERTIFIED FINANCIAL PLANNER™ Certificant, 2005

Business Director of Operations, G.W. Henssler & Associates, Ltd. 7/18 – present

Director of Operations, Henssler Asset Management, LLC 7/18 – present Managing Associate, G.W. Henssler & Associates, Ltd., 8/17 – 7/18 Managing Associate, Henssler Asset Management, LLC, 8/17 – 7/18 Training Manager, G.W. Henssler & Associates, Ltd., 10/12 – 8/17

Senior Associate, G.W. Henssler & Associates, Ltd., 10/12 – present Senior Associate, Henssler Asset Management, LLC, 10/12 – present

Associate, G.W. Henssler & Associates, Ltd., 8/06 - 10/12 Associate, Henssler Asset Management, LLC, 8/06 - 10/12 Assistant, G.W. Henssler & Associates, Ltd., 1/01 - 8/06 Assistant, Henssler Asset Management, LLC, 1/01 - 8/06

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Chief Operating Officer Stacy Haubenschild is the direct supervisor for Adam E. L. Ledbetter,

CFP®, and monitors his work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Peter Alan Lynch

Title: Associate

D.O.B. October 5, 1966

Education: University Wisconsin-La Crosse, Bachelor of Science, Finance, 1990

Series 65

Business Associate, G.W. Henssler & Associates, Ltd., 6/16 – present

Associate, Henssler Asset Management, LLC, 6/16 - present

Relationship Manager, Fidelity Private Wealth Management, 10/15 - 05/16

Associate Financial Consultant, Charles Schwab & Co., 3/03 – 08/15 Investment Account Manager, Bell Capital Management 1994–2001

Stockbroker, Charles Schwab & Co., 4/91 - 8/94

Disciplinary Information: None (100% clean record)

Other Business Activities: Service insurance clients with Henssler Insurance, LLC

Life Insurance Products Licensed

Additional Compensation: None (Not Applicable)

Supervision: Managing Associate Donald James Barker, CWS®, is the direct supervisor for Peter Lynch and

monitors his work on a daily basis.

Requirements for State-Registered Advisers: None (Not Applicable)

Name: Erica Leigh Martin

Title: Onboarding Specialist

D.O.B. September 2, 1979

Education: Kennesaw State University, Bachelor of Arts, French Studies, 2007

Business Onboarding Specialist, G.W. Henssler & Associates, Ltd., 4/19 – Present

Onboarding Specialist, Henssler Asset Management, LLC, 4/19 – Present

Financial Planner, G.W. Henssler & Associates, Ltd., 8/17-4/19 Financial Planner, Henssler Asset Management, LLC, 8/17-4/19 Client Service Associate, G.W. Henssler & Associates, Ltd., 4/16-8/17 Client Service Associate, Henssler Asset Management, LLC, 4/16-8/17 General Manager, Here to Serve Restaurant Group, 12/14-10/15

Manager, Here to Serve Restaurant Group, 10/13 - 12/14 Bartender, Here to Serve Restaurant Group, 4/09 - 10/13

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Director of Operations Adam Edgar Lamar Ledbetter, CFP®, is the direct supervisor for Erica L.

Martin and monitors her work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Travis Jarrett McKenzie, CFP®, CWS®

Title: Senior Associate
D.O.B. February 16, 1983

Education: Kennesaw State University, Bachelor of Business Administration, Finance, 2006

Kennesaw State University, Master of Business Administration, Finance, 2009

Certified Wealth Strategist® Certificant, 2011 Certified Financial Planner™ Certificant, 2015

Series 65

Business Senior Associate, G.W. Henssler & Associates, Ltd., 8/16 – present

Senior Associate, Henssler Asset Management, Ltd., 8/16 - present

Associate, G.W. Henssler & Associates, Ltd., 11/15 – 8/16 Associate, Henssler Asset Management, Ltd., 11/15 – 8/16 Financial Planner, G.W. Henssler & Associates, Ltd., 7/13 – 11/15 Financial Planner, Henssler Asset Management, LLC, 7/13 – 11/15

Wealth Strategist, Acru Wealth, LLC, 1/11 - 6/13

Underwriter, American International Group (AIG), Inc. 10/06 – 12/10

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Managing Associate Karl Canty Smith, CFP®, CEPA, is the direct supervisor for Jarrett McKenzie,

CFP®, CWS®, and monitors his work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Clay Norman

Title: Financial Planner
D.O.B. January 19, 1995

Education: Columbus State University, Bachelor of Business Administration in Finance, 2016

Business Financial Planner, G.W. Henssler & Associates, Ltd., 1/19 – Present

Financial Planner, Henssler Asset Management, LLC, 1/19 – Present Client Service Associate, G.W. Henssler & Associates, Ltd., 4/18 – 1/19 Client Service Associate, Henssler Asset Management, LLC, 4/18 – 1/19

Client Service Associate, Vallen Distributions, 2/17 - 4/18

Intern, The Money Advisor Group, 6/16 – 2/17

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Managing Associate Karl Canty Smith, CFP®, CEPA, is the direct supervisor for Clay Norman and

monitors his work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Karl Canty Smith, CFP®, CEPA

Title: Managing Associate D.O.B. February 10, 1983

Education: Kennesaw State University, Bachelor of Business Administration, Finance, 2008

Georgia State University, Master of Business Administration, Finance, 2013

Georgia State University, Master of Business Administration, Personal Financial Planning, 2013

CERTIFIED FINANCIAL PLANNER™ Certificant, 2012

Certified Exit Planning Advisor, 2018

Business Managing Associate, G.W. Henssler & Associates, Ltd., 1/16 – present

Managing Associate, Henssler Asset Management, LLC, 1/16 – present

Senior Associate, G.W. Henssler & Associates, Ltd., 7/13 – 1/16 Senior Associate, Henssler Asset Management, LLC, 7/13 – 1/16

Associate, G.W. Henssler & Associates, Ltd., 10/12 - 7/13Associate, Henssler Asset Management, LLC, 10/12 - 7/13

Financial Planner, G.W. Henssler & Associates, Ltd., 6/12 - 10/12 Financial Planner, Henssler Asset Management, LLC, 6/12 - 10/12 Account Executive, G.W. Henssler & Associates, Ltd., 7/11 - 6/12 Account Executive, Henssler Asset Management, LLC, 7/11 - 6/12

Assistant, G.W. Henssler & Associates, Ltd., 6/09 – 7/11 Assistant, Henssler Asset Management, LLC, 6/09 – 7/11

Operations Assistant, G.W. Henssler & Associates, Ltd., 5/08 –6/09 Operations Assistant, Henssler Asset Management, LLC, 5/08 –6/09

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Principal and Senior Managing Associate Jennifer J. Thomas, CFP®, is the direct supervisor for

K.C. Smith, CFP®, and monitors his work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Adam Stadalius

Title: Financial Planner
D.O.B. April 30, 1993

Education: Valdosta State University, 2011 – 2012

Kennesaw State University, Bachelor of Business Administration in Finance, 2017

Business Financial Planner, G.W. Henssler & Associates, Ltd., 8/18 – Present

Financial Planner, Henssler Asset Management, LLC, 8/18 – Present
Client Service Associate, G.W. Henssler & Associates, Ltd., 11/17 – 8/18
Client Service Associate, Henssler Asset Management, LLC, 11/17 – 8/18
Transportation Analyst, Capital Transportation Solutions, LLC, 9/17 – 11/17
Accounting/Finance Intern, Capital Transportation Solutions, LLC, 5/13 – 12/14

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Managing Associate Shawna L. Theriault, CPA, CFP®, CDFA®, is the direct supervisor for Adam

Stadalius, and monitors his work on a daily basis.

Requirements for State-Registered Advisers: None (Not Applicable)

Name: Shawna Lynn Theriault, CPA, CFP®, CDFA®

Title: Managing Associate D.O.B. June 22, 1978

Education: Western Governors University, Bachelor of Science, Accounting, 2009

Western Governors University, Master of Business Administration, 2012

CERTIFIED FINANCIAL PLANNER™ Certificant, 2006

Certified Public Accountant, 2011

Certified Divorce Financial Analyst, 2017

Business Managing Associate, G.W. Henssler & Associates, Ltd., 10/12 – present

Managing Associate, Henssler Asset Management, LLC, 10/12 – present

Associate, G.W. Henssler & Associates, Ltd., 1/11 - 10/12Associate, Henssler Asset Management, LLC, 1/11 - 10/12

Associate, Homrich Berg, 10/03 - 1/11Charles Schwab & Co., Inc., 10/00 - 7/03

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Principal and Senior Managing Associate Jennifer J. Thomas, CFP®, is the direct supervisor for

Shawna Theriault, CPA, CFP\*, CDFA\*, and monitors her work on a daily basis.

Requirements for State-Registered Advisers:

None (Not Applicable)

Name: Justin Jacob Wagner, AIF®

Title: Client Relationship Manager, Retirement Services

D.O.B. December 3, 1989

Education: University of Kentucky, Bachelor of Business Administration, Finance, 2012

Accredited Investment Fiduciary®, 2018

Business Client Relationship Manager, G.W. Henssler & Associates, Ltd., 11/17 – present

Client Relationship Manager, Henssler Asset Management, LLC, 11/17 – present

Financial Advisor, Morgan Stanley, 6/12 – 11/17

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Associate Senior Consultant Scott A. Brown, CFS®, is the direct supervisor for Justin J. Wagner,

AIF®, and monitors his work on a daily basis.

Requirements for State-Registered Advisers: None (Not Applicable)

Name: Joshua Paul Weidie, CWS®
Title: Senior Financial Planner

D.O.B. July 23, 1993

Education: Wake Forest University, Bachelor of Arts, History, 2015

Certified Wealth Strategist®, 2018

Business Senior Financial Planner, G.W. Henssler & Associates, Ltd., 4/19 – Present

Senior Financial Planner, Henssler Asset Management, LLC, 4/19 - Present

Financial Planner, G.W. Henssler & Associates, Ltd., 1/16 – 4/19 Financial Planner, Henssler Asset Management, LLC, 1/16 – 4/19

Intern, Congressman Steven M. Palazzo, 6/15 – 8/15

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision:

 $Managing\ Associate\ Shawna\ L.\ The riault,\ CPA,\ CFP^{\circledast},\ CDFA^{\circledast},\ is\ the\ direct\ supervisor\ for\ Joshua$ 

Weidie, CWS®, and monitors his work on a daily basis.

Requirements for State-Registered Advisers: None (Not Applicable)

Name: Melanie Eischeid Wells, CFP®

Title: Associate

D.O.B. November 14, 1986

Education: University of Georgia, Bachelor Science in Family Consumer Sciences, Family Financial

Planning, 2010

CERTIFIED FINANCIAL PLANNER™ Certificant, 2014

Business Associate, G.W. Henssler & Associates, Ltd., 11/15 – present

Associate, Henssler Asset Management, Ltd., 11/15 – present Financial Planner, G.W. Henssler & Associates, Ltd., 8/14 – 11/15 Financial Planner, Henssler Asset Management, LLC, 8/14 – 11/15

Assistant, G.W. Henssler & Associates, Ltd., 7/12 – 8/14 Assistant, Henssler Asset Management, LLC, 7/12 – 8/14

Operations Assistant, G.W. Henssler & Associates, Ltd., 5/11-6/12 Operations Assistant, Henssler Asset Management, LLC, 5/11-6/12 Assistant, Henssler Financial Tax & Accounting Division, 1/11-4/11

Intern, Brecker Grossmith, 6/10 –7/10 Intern, Miller Wealth Financial, 5/09 – 7/09

Disciplinary Information: None (100% clean record)
Other Business Activities: None (Not Applicable)
Additional Compensation: None (Not Applicable)

Supervision: Managing Associate Karl Canty Smith, CFP®, is the direct supervisor for Melanie E. Wells, CFP®,

and monitors her work on a daily basis.

Requirements for State-Registered Advisers: None (Not Applicable)

# **Qualifications Required to Obtain and Maintain Designations**

### Certified Financial Planner™ (CFP®)

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 71,000 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 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 CFP® Exam is offered in a computer-based format during an 8-day testing window. The exam is administered on one day during two three-hour testing sessions, separated by a scheduled 40-minute break. The exam 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:

#### **Ongoing Requirements**

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**

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.

## **Chartered Financial Analyst (CFA)**

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

# High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters
- Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment.

## Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession. To learn more about the CFA charter, visit www.cfainstitute.org.

### **Ongoing Requirements**

The CFA Institute recommends that members complete a minimum of 20 hours of CE credit activities, with a minimum of 2 hours in the topics of Standards, Ethics, and Regulations (SER) each calendar year.

# **Certified Valuation Analyst**

The Certified Valuation Analyst designation serves to advise other professionals, prospective clients, and the community at large that the member satisfied the National Association of Certified Valuators and Analysts' rigorous standards of professionalism, expertise, objectivity, and integrity in the field of business valuation.

The examination and recertification process is designed to ensure a valuation practitioner who earns the CVA has the requisite skills and ethics to uphold the highest standard for competent practice in the business valuation profession. To assure the integrity of the CVA certification program, National Association of Certified Valuators and Analysts (NACVA) members oversee the certification programs through the mechanism of the Valuation Credentialing Board (VCB).

## **Qualifications for CVA Certification**

#### For C.P.A.s:

1. Hold an active, valid, and unrevoked C.P.A. license issued by a legally constituted state authority (the Chartered Accountant [CA] designation issued in Canada is equivalent to the C.P.A. in the United States).

#### For Non- C.P.A.s:

- 1a. Hold a business degree (i.e., management, economics, finance, marketing, accounting, or other business field) and/or a Master of Business Administration (MBA) or higher business degree from an accredited college or university; and
- 1b. Be able to demonstrate, with business references or attestations from current or previous employers and/or partners, substantial experience in business valuation. For this purpose, substantial could mean:
  - I. Two years or more full-time or equivalent experience in business valuation and related disciplines; or
  - II. Having performed 10 or more business valuations where the applicant's role was significant enough to be referenced in the valuation report or a signatory on the report; or
  - III. Being able to demonstrate substantial knowledge of business valuation theory, methodologies, and practices. For example, having a combination of published works on the subject and completed either a Ph.D. in finance or economics or a Doctor of Business Administration (DBA) from an accredited institution of higher education and having some work experience. Or, having obtained an accreditation from another recognized valuation-accrediting organization.

# For All Applicants:

- 2. Be a Practitioner member in good standing with NACVA;
- 3. Successfully demonstrate that applicant meets NACVA's Experience Threshold by completing a sample Case Study or submitting an actual and sanitized Fair Market Value (FMV) report (FMV as defined by Revenue Ruling 59–60) prepared in the last 12 months for peer review;
- 4. Attend an "optional" five-day training program;
- 5. Submit three personal and three business references; and
- 6. Pass a comprehensive, five-hour, multiple-choice, proctored examination.

An application to take the examination must be submitted prior to issuance of the exam. To hold an active CVA designation, individuals must pay requisite annual fees and comply with tri-annual recertification. CVAs who allow these requirements to lapse will lose their certification and must reapply to become certified if they later choose to reinstate.

## CVA Exam and Applied Experience

The certification process consists of two parts: Part One (testing knowledge) is the proctored portion, Part Two (evaluating applied experience) is a take-home/in-office Case Study. The five-hour proctored exam consists of multiple-choice questions, testing applicants on NACVA's Business Valuation Body of Knowledge. The exam is administered at the conclusion of each five-day training program NACVA sponsors throughout the country, or at local proctoring facilities NACVA has contracted with nationwide for the applicants' convenience. Part Two is a 60-80 hour sample Case Study provided by NACVA and requires the completion of a comprehensive business valuation report. Applicants have 60 days to complete and submit the Case Study portion of the exam, starting from the date they take the proctored exam. Certified Valuation Analyst (CVA) candidates with *substantial experience* in the field of business valuation may qualify to waive NACVA's prerequisite for demonstrating they meet NACVA's Experience Threshold, currently requiring that one either take our Case Study or submit an actual valuation report.

#### Experience Requirement for Designations:

Experience Requirement for a "C.P.A.-CVA Candidate": Applicant must have the legal right to display "C.P.A." after their name. A C.P.A.-CVA applicant lacks the Experience Requirement if he or she has either: (i) passed the C.P.A. exam, but is lacking the

Experience Requirement as identified by his or her state, which prevents the applicant from obtaining the C.P.A. license and displaying "C.P.A." after his or her name; or (ii) who has a suspended or lapsed C.P.A. license. Candidates must comply with NACVA's recertification requirements.

Experience Requirement for a Non-C.P.A.-CVA Candidate: Applicant must have met the substantial experience requirement, as defined in the qualifications for Non- C.P.A. candidates. Candidates must comply with NACVA's recertification requirements.

## **Ongoing Requirements**

Recertification assures that designees continue to enhance their knowledge and maintain a level of competence current with the progress of the industry.

NACVA's recertification program follows a 60-point/60 CPE-hour system, whereby designees must obtain 60 points to comply with recertification. One hour of Continuing Professional Education (CPE) equals one point. The point system allows for additional (bonus) points for attendance to training (recommended programs) that NACVA considers especially helpful for practitioners to stay well-rounded in the performance of their services, increase their awareness of recent industry developments, and be alert to issues that lead to, or contribute to, the quality of one's work product. It also awards points for contributions to industry knowledge upon meeting certain criteria. By obtaining additional points, one can reduce the 60-hour CPE requirement to as low as 36 hours in a three-year cycle.

## Behavioral Financial Advisor™ ("BFA™")

The Behavioral Financial Advisor™ designation is a program designed to educate financial professionals on the core concepts of Behavioral Finance and its application with clients. The BFA™ designation is obtained through an online program offered through a partnership between Kaplan Financial and Think2Perform. This program also helps advisors differentiate themselves by adding an extra dimension to the advice they provide to clients. The ability to help clients manage their emotions and connect their goals and behavior with what is most important to them is a significant value-add. An advisor who understands and leverages Behavioral Finance will also be better able to build deep, meaningful relationships with his/her clients.

#### Education

The Behavioral Financial Advice program is delivered online and consists of two courses, designed to be completed in approximately 20 to 30 hours. The program provides you with concepts to incorporate into your practice right away—even before course completion. After completion of the BFA program, applicants must pass an online Certification Exam to become a Behavioral Financial Advisor™.

# Ongoing Requirements

Behavioral Financial Advisor™ designation must complete 16 hours of continuing education every two years.

### Certified Exit Planning Advisor® (CEPA®)

Formed in 2005, the Exit Planning Institute™ is considered the standard trendsetter in the field of exit planning across the globe. It is the only organization that offers the Certified Exit Planning Advisor Program (CEPA), making it the most widely accepted and endorsed professional exit planning program in the world. Advisors who earn the CEPA designation have the ability to holistically serve business owners' needs regardless of the timing of their exit.

#### **Education**

The Certified Exit Planning Advisor (CEPA) Program is a five-day executive MBA-style program that includes 23 modules taught by 13 expert instructors, which trains and certifies qualified professional advisors in the field of exit planning. The Value Acceleration Methodology™ is the process taught at the CEPA Program, which integrates exit strategy into business, personal, and financial goals of the business owner. Participants who successfully complete the CEPA program, and pass the closed book proctored exam, receive the Certified Exit Planning Advisor® (CEPA®) credential.

## **Experience Requirement**

Five years or more, full-time or equivalent, experience working directly with business owners as a financial advisor, attorney, CPA, business broker, investment banker, commercial lender, valuation advisor, estate planner, insurance professional, business consultant or a similar professional capacity plus an undergraduate degree from a qualifying institution; if no qualifying degree must submit additional professional work experience (two years of relevant professional experience may be substituted for each year of required undergraduate studies).

## Ongoing Requirements

The Certified Exit Planning Advisor (CEPA) credential must be renewed every three (3) years. Renewal application with payment is due no later than December 31 of the year of certification expiration. Renewing certification holders must have completed a minimum of 40 hours of exit planning related professional development, or a minimum of 30 hours of exit planning related professional development plus 10 hours of qualifying leadership, authorship, and teaching activities contributing to the exit planning profession.

## Certified Wealth Strategist® (CWS®)

The Certified Wealth Strategist® Education and Designation have been developed by the Cannon Financial Institute.

The Certified Wealth Strategist® designation program provides financial services professionals an additional level of knowledge to both competently and confidently serve their clients and to exceed client expectations. The program is designed to provide financial services professionals with the knowledge and skill sets needed to work with more complex client issues in these four broad and primary phases of wealth management: Creation and Growth of Wealth, Preservation and Protection of Wealth, Distribution of Wealth during Life, and Distribution of Wealth at Death.

#### Education

The Certified Wealth Strategist® program's curriculum is presented by blending six different educational formats to maximize the learning experience:

- Instructor-Led Training CWS® Practice Management Skills and CWS® Client Interaction Skills
- Reading Assignments Case Studies and Self-Assessments
- Audio Assignments
- Interactive e-Learning Lessons
- Online Mastery Examinations
- A Capstone Project

This multi-format presentation allows participants to accelerate the assimilation of complex concepts in a more efficient and successful manner. It also allows advisors to bring their new set of competencies to their clients, while minimizing the time away from their primary job responsibilities.

## Capstone Project

At the end of the CWS® program of study, The Capstone Project includes a business plan and case study that demonstrates use of the knowledge and skills acquired during the Certified Wealth Strategist® program. Capstone Projects articulate action steps for:

- Client interactions, scripts, topics and tools
- Business practice changes, actions and tools
- Resource use, source and location
- Knowledge inventory, gaps and solutions

## Experience

CWS® certificants are required to have more than three years' experience in the financial services industry and significant experience in a client-facing role, or a four-year degree from an accredited school.

## **Ethics**

In accepting the Certified Wealth Strategist® designation certificants support and adhere to the obligations and responsibilities set out below.

- Responsible to the public to provide accurate and truthful representation in advertising and public statements regarding services and expected results.
- Responsible to the client to provide objective, accurate and truthful professional services.
- Responsible to maintain and respect confidentiality of sensitive information obtained in the execution of professional responsibilities.
- Responsible to ensure that a client's interests are not compromised by conflicts of interest or other unethical and inappropriate influence of professional judgment.

### **Ongoing Requirements**

CWS® certificants are required to complete 33 hours of CE (30 general and 3 Ethical) for each reporting period. Reporting period is defined as two-years, beginning January 1 following the date of receiving CWS® certification. The subject matter for general CE must entail technical training that extends knowledge within the 13 Wealth Management Issues and/or training that improves on practice management and client relationship building skills.

## Certified Fund Specialist® (CFS®)

The Certified Fund Specialist® (CFS®) designation is awarded to individuals who complete training provided by the Institute of Business & Finance (IBF) in the form of a 60-hour self-study program, including an exam administered by the Financial Industry Regulatory Authority (FINRA). Students must also complete an open-book case study. The designation is the oldest designation in the mutual funds industry.

CFS designation is an intermediate-to-advanced course on mutual funds, exchange-traded securities, REITs, closed-end funds, and similar investments. Candidates learn about advanced topics in fund analysis and selection, asset allocation, and portfolio construction. In addition, candidates gain sophisticated investment strategies for risk management, taxes, and estate planning.

To earn this designation, candidates must have at least 2,000 hours of work experience in the financial services industry or a bachelor's degree from an accredited college or university. The designation will not be granted until the required minimum number of hours has been fulfilled or a bachelor's degree has been granted. Designees must report 30 hours of CE every two years directly to IBF.

## Chartered Retirement Planning Counselor<sup>SM</sup> (CRPC®)

Individuals who hold the Chartered Retirement Planning Counselor<sup>sm</sup> or CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. The program is designed for approximately 120-150 hours of self-study. The program is self-paced and must be completed within one year from enrollment.

The CRPC® designation is offered by The College for Financial Planning, a regionally-accredited institution of higher education accredited by the Higher Learning Commission and is a member of the North Central Association. The College offers a Master of Science degree with a Personal Financial Planning major and two Master of Science in Finance degrees, several proprietary

professional designations, and the CFP Certification Professional Education Program. Founded in 1972, the College is the country's oldest provider of financial planning education and has over 158,000 graduates from its Masters and non-degree programs.

Individuals are required to pass an online, timed and proctored end-of-course examination with a 70% score or higher. The examination tests the individual's ability to relate complex concepts and apply theoretical concepts to real-life situations.

After successful completion of the end-of-course examination, individuals apply for authorization to use the designation. The application includes:

## Adherence to Standards of Professional Conduct

#### Integrity

Provide professional services with integrity, honor, fairness, and dignity and maintain client trust and confidence.

#### Objectivity

Maintain objectivity and impartiality with respect to services rendered and advice given.

#### Competency

Maintain an adequate level of knowledge and skill and effectively apply that knowledge while recognizing its limitations.

## Confidentiality

Keep client information confidential, disclosing only when authorized or compelled by law.

#### Professionalism

Comply with all laws and regulations as required and applicable, refraining from actions that bring dishonor to you or your profession.

#### Self-Disclosure

Applicants must disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.

#### Adherence to Terms and Conditions

The Terms and Conditions outline designees' rights to use the College's Marks and acknowledge the rights of the College to protect the Marks from unauthorized use by individuals or entities.

## **Certified Public Accountant (CPA)**

The Certified Public Accountant designation is a national professional certification. The State Boards of Accountancy determines the laws and rules for each state/jurisdiction. Educational requirements vary by state. The Georgia State Board of Accountancy licenses certified public accountants and public accounting firms. Applicants for CPA licensure must meet sufficient requirements for education and experience and pass a national examination.

#### **Education and Examination**

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination.

#### **Ongoing Requirements**

In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of

Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

## Certified Financial Divorce Analyst® (CDFA®)

The Institute for Divorce Financial Analysts™ (IDFA™) was founded in 1993 to provide specialized training to accounting, financial and legal professionals in the field of pre-divorce financial planning. The Institute provides comprehensive education using a variety of knowledge and skill building techniques. Candidates will learn how to help their clients with financial issues that will affect the rest of their lives. After successfully completing the course, candidates receive the Certified Divorce Financial Analyst® (CDFA®) designation. To attain the right to use the CDFA® certification, an individual must satisfactorily fulfill the following requirements:

#### **Education**

CDFA® professionals must develop their theoretical and practical understanding and knowledge of the financial aspects of divorce by completing a comprehensive course of study approved by the IDFA™.

#### **Examination**

CDFA® practitioners must pass a four-part Certification Examination that test their understanding and knowledge of the financial aspects of divorce. In addition, the practitioner must demonstrate the practical application of this knowledge in the divorce process. Candidates must also be in good standing with their Broker Dealer (if applicable) and the FINRA/SEC or other licensing or regulatory agency

## **Experience**

CDFA® professionals must have three years minimum experience in a financial services capacity and a four-year Bachelor's degree from an accredited university prior to earning the right to use the CDFA® certification mark.

## **Ethics**

As a final step to certification, CDFA® practitioners agree to abide by a strict code of professional conduct known as the IDFA Code of Ethics and Professional Responsibility that sets forth their ethical responsibilities to the public, clients, employers and other professionals. The IDFA™ may perform a background check during this process and each candidate for CDFA® certification must disclose any investigations or legal proceedings relating to his or her professional or business conducts.

## **Ongoing Requirements**

Once certified, CDFA® practitioners are required to maintain technical competence, fulfill ethical obligations, and remain a member of IDFA in good standing. Every two years, they must complete a minimum of fifteen (15) hours of continuing education specifically related to the field of divorce.

### Accredited Investment Fiduciary® (AIF®)

Accredited Investment Fiduciary® (AIF®) training empowers investment professionals with the fiduciary knowledge and tools they need to serve their clients' best interests while successfully growing their business. Advisors who earn the AIF® Designation from Fi360 are immediately able to demonstrate the added value they bring to prospective and existing clients.

#### **Education:**

The AIF® Training is available in two formats: AIF® Self-Paced Online ("Online") and AIF® Capstone ("Capstone"). Each product includes access to identical online educational content. Applicants have ninety (90) days of access to the online content provided with the Online format, while one-hundred-eighty (180) days is provided for the Capstone format. The Capstone format includes an additional six- to eight-hour instructor-led seminar. AIF® Examination consists of sixty (60) multiple choice questions with a time-limit of ninety (90) minutes. A paper-based examination is available upon prior arrangement by Fi360 or the exam taker and may only be proctored by Fi360 personnel.

#### Prerequisites and Experience Requirements:

One of the following combinations of education, industry experience, and/or professional development is required to meet the experience requirement for the AIF® Designation. Relevant experience is that which has been accrued in a non-clerical role within the financial services (or a related) industry.

Minimum of two (2) years of relevant experience; a bachelor's degree (or higher); and a professional credential.

Minimum of five (5) years of relevant experience; a bachelor's degree (or higher) or a professional credential.

Minimum of eight (8) years of relevant experience.

If an applicant meets the required experience (prerequisites), there are four initial requirements for attaining the Accredited Investment Fiduciary® (AIF®) Designation:

Enroll in and complete the Designation Training

Pass the Examination

Satisfy the Code of Ethics and Conduct Standards

Submit the application and remit payment of annual dues

The requirements must be met sequentially with the exception of the experience requirement. It can be met prior to initiating, or concurrent with, previous steps in the process, though it must be met within one (1) year of passing the Examination. After one year, candidacy is terminated, and previously-completed training and/or examination will be nullified.

# Fi360 Designee Code of Ethics:

Fi360 AIF® Designees recognize that this Code of Ethics, and its principles and obligations, are in addition to those set forth by any other Code that governs their professional and ethical conduct.

To clients, a Fi360 AIF® Designees will:

Employ and provide the client information on the Prudent Practices when serving as an investment fiduciary and/or advising other investment fiduciaries.

Act with honesty and integrity and avoid conflicts of interest, real or perceived.

Ensure the timely and understandable disclosure of relevant information that is accurate, complete, and objective.

Be responsible when determining the value of my services and my form of compensation; taking into consideration the time, skill, experience, and special circumstances involved in providing my services.

Know the limits of my expertise and refer my clients to colleagues and/or other professionals in connection with issues beyond my knowledge and skills.

Respect the confidentiality of information acquired in the course of my work, and not disclose such information to others, except when authorized or otherwise legally obligated to do so. I will not use confidential information acquired in the course of my work for my personal advantage.

Not exploit any relationship or responsibility that has been entrusted to me.

To a Fi360 AIF® Designee's community (whether defined by work, family, and/or friends), I will:

Proactively promote and be a steward of ethical behavior as a responsible partner among my peers in the work environment and in my community.

Ensure that the overall promotion of my practice is implemented in the best interests of my profession.

Seek, accept, and offer honest criticism of technical work; acknowledge and correct errors; and properly credit the contributions of others.

Use corporate assets and resources employed or entrusted to me in a responsible manner.

Continue to improve my knowledge and skills, share ideas and information with colleagues, and assist them in their professional development.

## **Ongoing Requirements**

Fi360 AIF® Designees are required to complete six (6) CE hours per reporting period. The CE Requirement is effective immediately upon attainment of a designation, and CE hours may be accrued from a variety of sources. Each reporting period is defined as the twelve months preceding the 'Next Renewal Date'. CE may also be earned for a reporting period during the 30-day grace period following the Renewal Date.