

**FORM ADV PART 2A**  
**DISCLOSURE BROCHURE**

**Fort Collins Tax Service, LLC**  
**dba**

**Financial Planning Fort Collins**

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This brochure provides information about the qualifications and business practices of Fort Collins Tax Service, LLC dba Financial Planning Fort Collins being registered as a registered investment advisor and does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 970-225-0504. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Financial Planning Fort Collins (CRD #283890) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**January 25, 2021**

## **Item 2: Material Changes**

### **Annual Update**

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

### **Material Changes since the Last Annual Update**

- Item 4 - We've added "basic" and "essential" services. Please see Item 4 for details.
- Item 4 - We've added "limited scope" package financial planning and consulting services. Please see Item 4 for details.
- Item 5 - We've added fees for "basic" and "essential" services. Please see Item 5 for details.
- Item 5 - We've updated fees for "comprehensive" services. Please see Item 5 for details.
- Item 18 - We are voluntarily disclosing that the firm obtained a loan under the Paycheck Protection Program. Please see Item 18 for details.

### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at 970-225-0504 or by email at [info@fpfoco.com](mailto:info@fpfoco.com).

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## **Item 4: Advisory Business**

Fort Collins Tax Service, LLC dba Financial Planning Fort Collins (“FPFoCo”) was founded in November of 2014 and registered as an investment advisor in May of 2016. Jason S. Speciner is 100% owner.

As of December 31, 2019, FPFoCo reports \$32,941,152 in discretionary assets under management and \$0 in non-discretionary assets under management.

FPFoCo does not act as a custodian of client assets.

This document provides important information about our services and fees, as well as all material conflicts of interest. Please read carefully.

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### **Service Packages**

#### **Comprehensive Services**

Primarily, we offer a specific combination of our services outlined below under a single agreement, which we refer to as comprehensive services. Clients engaging FPFoCo for comprehensive services receive the following services as a part of a single agreement, for a single fixed annual fee:

- investment management services
- Open Advice package financial planning and consulting
- income tax preparation through Fort Collins Tax Service, LLC

Each of these services is described in greater detail below and the fees pertaining to comprehensive services are outlined in Item 5 of this brochure.

#### **Essential Services**

Additionally, we offer another specific combination of our services outlined below under a single agreement, which we refer to as essential services. Clients engaging FPFoCo for essential services receive the following services as a part of a single agreement, for a single fixed upfront and ongoing monthly fee:

- investment management services, exclusively through an outside manager
- Limited Scope package financial planning and consulting
- discounted income tax preparation through Fort Collins Tax Service, LLC, as outlined in the Fort Collins tax Service, LLC, discount policy

Each of these services is described in greater detail below and the fees pertaining to essential services are outlined in Item 5 of this brochure.

#### **Basic Services**

Lastly, we offer another specific combination of our services outlined below under a single agreement, which we refer to as basic services. Clients engaging FPFoCo for basic services receive the following services as a part of a single agreement, for a variable/hourly fee:

- investment management services, exclusively through an outside manager
- Project Advice package financial planning and consulting, exclusively on an hourly basis
- eligibility for discounted income tax preparation through Fort Collins Tax Service, LLC, as outlined in the Fort Collins tax Service, LLC, discount policy, if the client pays a fee to FPFoCo.

Each of the service components for all service packages are described in greater detail below and the fees pertaining to all service packages are outlined in Item 5 of this brochure.

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## Investment Management Services (FPFoCo manages accounts)

One of our offerings is the management of individually tailored investment portfolios. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation target. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

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## Investment Management Services (Outside Manager)

Additionally, we offer the use of Third Party Managers, Outside Managers, or Sub-Advisors ("Outside Manager") for investment management services. We may assist clients in selecting an appropriate allocation model, completing the Outside Manager's investor profile questionnaire, interacting with the Outside Manager and reviewing the Outside Manager. Our review process and analysis of Outside Managers is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we may meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

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## Financial Planning and Consulting

Finally, our core business is providing financial planning and consulting services. FPFoCo may offer three financial planning and consulting service options for clients:

- **"Project Advice package"**
  - Client pays for one financial plan or consultation and the contract is complete after delivery of the agreed upon services. (formerly: One-time package)
- **"Open Advice package"**
  - Client receives ongoing financial planning and consulting services. Contract is automatically renewed annually unless terminated by either party with written notice. (formerly: Core analysis package)
- **"Limited Scope package"**
  - Client receives: an initial, one-hour consultation virtual meeting; access to regularly scheduled 15-minute virtual meetings; access to online, self-guided personal finance education modules; a one-hour consultation virtual meeting on the agreement anniversary. Additional consultation time is available for an additional fee. Contract is automatically renewed annually unless terminated by either party with written notice.

Services for financial plans and consultations include but are not limited to:

- budgeting
- cash flow analysis
- divorce planning

- education fund planning
- employer benefits planning
- estate analysis & planning
- investment portfolio review/evaluation
- retirement account investment analysis & allocation
- retirement planning
- risk management analysis
- student loan management planning
- tax planning

**Project Advice** package financial planning analysis, recommendations, and/or consultations will be completed and delivered inside of sixty (60) days, dependent upon timely client delivery of required documentation.

**Open Advice** package services involve the ongoing availability of FPFoCo for in-person meetings, web conferences, phone calls, email consultations, financial planning analysis, and recommendations on an as-needed basis during the annual agreement term. Services are delivered on an as-needed basis, as soon as reasonably possible. Initial and renewal financial planning analysis and recommendations are delivered inside of sixty (60) days, dependent upon timely client delivery of required documentation.

**Limited Scope** package services are delivered on an ongoing basis. Initial and renewal one-hour consultation meeting notes/summaries will be delivered to client via email following the meeting. No meeting notes/summaries will be delivered to client at the conclusion of 15-minute consultations. Client will have access to customizable materials in the self-guided personal finance education modules.

The goals and objectives for each client are documented in our client files. Investment strategies are created by FPFoCo that reflect the stated goals and objectives of the client. Fees pertaining to these services are outlined in Item 5 of this brochure.

Our financial planning and consulting services are provided on a non-discretionary basis, which means that you have sole discretion to decide whether to implement any of our recommendations. You are solely responsible for implementing all advice received from FPFoCo in connection with our financial planning and consulting services. You are under no obligation to act on any recommendation we provide you. FPFoCo and its investment adviser representatives do not sell financial products or receive additional compensation for your action to implement or not implement any advice received. We will encourage the implementation of advice in good faith, but will not be responsible or liable for your failure to implement.

If you elect to act on any recommendation, you are under no obligation to effect any transaction through FPFoCo or any of its investment adviser representatives. FPFoCo is not affiliated with any broker-dealer. None of the investment adviser representatives of FPFoCo is licensed to sell insurance products, real estate, or securities, nor are they registered representatives of any broker-dealer. For stand-alone financial planning and consulting engagements, you may choose to have FPFoCo provide investment management services, which may include implementation of our financial planning or consulting recommendations, in which case FPFoCo will receive compensation for such services based on your assets under management, but you are not obligated to retain our investment management services.

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## **Income Tax Preparation and Representation Services**

We offer income tax preparation and representation services under our legal entity name, Fort Collins Tax Service, LLC. These services are available to both clients and non-clients of FPFoCo and in limited cases their controlled or related entities. These services are provided under a separate

and distinct agreement for tax preparation and/or representation only. Fees pertaining to this service are outlined in Item 5 of this brochure.

## Item 5: Fees and Compensation

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment management, outside investment management, and/or financial planning and consulting agreement the agreement may be terminated by the client within five (5) business days of signing the agreement without incurring any fees.

How we are paid depends on the type of service we are performing. Please review the fee and compensation information below. Lower fees for comparable services may be available from other sources.

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### Comprehensive Services

Comprehensive services are priced subjectively according to the degree of complexity (please see the Item 5 section titled "Complexity," below) associated with the client's situation and financial circumstances and will be based on a single fixed annual fee, which is negotiable. The minimum annual fee for comprehensive services is \$4,000. The maximum annual fee is dependent on a number of factors including the amount of assets we manage for a client, as well as the complexity of a client's situation and financial circumstances. In either case, the annual fee will be expressed as a dollar amount in the client agreement and not as a percentage of assets under management. It is important to note that because the fees for comprehensive services encompass both financial planning and investment management services, the total fee when expressed as a percentage of assets under management may in some cases exceed 3% of assets under management on an annual basis, but FPFoCo intends to charge fees that are reasonable in light of the services provided. We reserve the right to waive or reduce the minimum annual fee in certain circumstances based on the level of services we provide.

In addition to open advice financial planning and income tax preparation, the fixed annual fee includes investment management for assets up to the amounts outlined below (identified as Investable Net Worth). The actual assets under management for a client may be lower than the amount included based on the client's annual fee. Clients who have signed agreements prior to January 25, 2021 will have a different fee schedule, as outlined in the client agreement.

<b>Minimum Annual Fee</b>	<b>Investable Net Worth (INW)</b>
\$4,000	Up to \$500,000
\$6,000	Up to \$1,000,000
\$8,000	Up to \$1,500,000
\$10,000	Up to \$2,000,000
\$11,000	Up to \$2,500,000
\$12,000	Up to \$3,000,000
+ \$1,000	per additional \$1,000,000 of INW

The fixed annual fee is prorated and paid in advance or arrears on a calendar monthly or quarterly basis, depending on agreement between the client and FPFoCo, as indicated in the client agreement or updated in writing. For example, a client with a \$6,000 fixed annual fee electing to pay monthly in advance would be invoiced a prorated fee for the period between the agreement effective date and the first day of the next month, due and payable upon presentation. The client would then pay

\$500 on the first day of the month following the agreement effective date and each first day of the month thereafter, for services for the current month, until the agreement is terminated or modified in writing. For another example, a client with a \$26,000 fixed annual fee electing to pay quarterly in arrears would be invoiced a prorated fee for the period between the agreement effective date and the first day of the next quarter, due and payable on the first day of the quarter following the agreement effective date. The client would then pay \$6,500 each first day of the quarter thereafter, for services for the previous quarter, until the agreement is terminated or modified in writing.

We aggregate the value of accounts for individuals living within the same household, their dependents, and entities under their control to determine the amount of assets under management included in the fixed annual fee. Each individual and/or responsible party included in this aggregation must sign a comprehensive services agreement.

There is no minimum term for comprehensive services agreements. Clients and/or FPFoCo may terminate a comprehensive services agreement at any time with written notice. If the client pays in advance, any unearned fees, measured and prorated by the number of days from the date of termination until the end of the applicable billing period, will be returned to the client. If the client pays in arrears, any earned fees, measured and prorated by the number of days from the first day of the applicable billing period through the date of termination, will be due and payable from the client.

All balances due for comprehensive services fees may be paid by check, credit card, or electronic funds transfer, including the debiting of accounts held at a custodian where we are permitted and able to debit fees from accounts.

Fees for comprehensive services are reviewed proactively every 2nd agreement anniversary. An increase or decrease in fees may result from this review. However, absent a significant change in the client's financial situation and resulting complexity, clients should generally expect fees to increase or remain the same as a result of this review. A client is never obligated to accept a new fee.

**When an Outside Manager manages accounts:**

**Betterment** — The use of Betterment as an Outside Manager is optional. In addition to our fixed annual fee, Betterment charges our clients an annual fee (currently 0.15%) for accounts held at Betterment Securities for which Betterment is our Outside Manager. Betterment's fee is prorated, billed, and payable as outlined in Betterment's client agreement. If you elect to have fees for comprehensive services debited from accounts held at Betterment Securities, Betterment will debit both our fee and Betterment's fee simultaneously and pay our fee to us on your behalf. You will enter into a separate agreement with Betterment and Betterment Securities for their services.

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**Essential Services**

Essential services pricing is fixed and publicly advertised on our website. Fees are comprised of an upfront fee, an ongoing monthly fee, and an hourly fee for additional consultation time. Each fee component will be no more than \$500. Fees are payable in advance and will be outlined in the client agreement and will not change unless agreed to in writing by the client. It is important to note that because the fees for essential services encompass both financial planning and investment management services, the total fee when expressed as a percentage of assets under management may in some cases exceed 3% of assets under management on an annual basis, but FPFoCo intends to charge fees that are reasonable in light of the services provided.

There is no minimum term for essential services agreements. Clients and/or FPFoCo may terminate an essential services agreement at any time with written notice. For monthly fees paid in advance, any unearned fees, measured and prorated by the number of days from the date of termination until the end of the applicable billing period, will be returned to the client.

All balances due for essential services fees may be paid by check, credit card, or electronic funds transfer.

**When an Outside Manager manages accounts:**

**Betterment** — In addition to our fixed fees, Betterment charges our clients an annual fee (currently 0.15%) for accounts held at Betterment Securities for which Betterment is our Outside Manager. Betterment’s fee is prorated, billed, and payable as outlined in Betterment’s client agreement. You will enter into a separate agreement with Betterment and Betterment Securities for their services.

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**Basic Services**

Basic services pricing is variable/hourly and publicly advertised on our website. Fees are billed hourly for consultation time, which will be no more than \$500 per hour. Fees are payable in arrears and will be outlined in the client agreement and will not change unless agreed to in writing by the client. It is important to note that because the fees for basic services encompass both financial planning and investment management services, the total fee when expressed as a percentage of assets under management may in some cases exceed 3% of assets under management on an annual basis, but FPFoCo intends to charge fees that are reasonable in light of the services provided.

There is no minimum term for basic services agreements. Clients and/or FPFoCo may terminate a basic services agreement at any time with written notice. Any unpaid fees from additional consultations actually held will be due and payable from the client.

All balances due for basic services fees may be paid by check, credit card, or electronic funds transfer.

**When an Outside Manager manages accounts:**

**Betterment** — In addition to our fees, Betterment charges our clients an annual fee (currently 0.15%) for accounts held at Betterment Securities for which Betterment is our Outside Manager. Betterment’s fee is prorated, billed, and payable as outlined in Betterment’s client agreement. You will enter into a separate agreement with Betterment and Betterment Securities for their services.

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**Investment Management Services**

For standalone investment management services, our fees are as follows. Service package (basic, essential, comprehensive services) clients do not pay separately for investment management services.

Our current standard management fee is based on the market value of the assets under management (AUM) and is calculated as follows. Clients who have signed agreements prior to January 27, 2020 will have a different fee schedule, as outlined in the client agreement.

<b>Account Value</b>	<b>Annual Management Fee (as a % of AUM)</b>
\$1 - \$500,000	0.95%
\$500,001 - \$1,000,000	0.80%
\$1,000,001 - \$2,000,000	0.65%
\$2,000,001 - \$3,000,000	0.50%
\$3,000,001 and above	0.35%

**When FPFoCo manages accounts:**

The annual fees are negotiable and are prorated and paid in advance on a calendar quarterly basis (January, April, July, October). The management fee is a blended fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart (or as negotiated), applying the fee to the account value as of the last day of the previous quarter, resulting in a combined weighted fee.

For example, an account valued at \$1,000,000 would pay a combined weighted fee of 0.875% or an equivalent annual dollar fee of \$8,750. The quarterly fee would be \$2,187.50 and is determined by the following calculation:  $((\$500,000 \times 0.95\%) + (\$500,000 \times 0.80\%)) \div 4 = \$2,187.50$ . For another example, an account valued at \$5,000,000 would pay a combined weighted fee of 0.545% or an equivalent annual dollar fee of \$27,250. The quarterly fee would be \$6,812.50 and is determined by the following calculation:  $((\$500,000 \times 0.95\%) + (\$500,000 \times 0.80\%) + (\$1,000,000 \times 0.65\%) + (\$1,000,000 \times 0.50\%) + (\$2,000,000 \times 0.35\%)) \div 4 = \$6,812.50$ .

Accounts initiated during a calendar quarter will be charged a prorated fee based on the amount of time remaining in the billing period, as of the date the new assets are received into the account by the custodian. The value for billing purposes will be the closing price reported by the account custodian as of the date the new assets are received into the account.

We aggregate the value of all accounts we manage for individuals living within the same household, their dependents, and entities under their control to determine which fee level will apply for billing. Management fees are directly debited from client accounts, or the client may choose to pay by check.

An account may be explicitly terminated with written notice. An account may be implicitly terminated by the full value custodial transfer of assets, full value outgoing rollover, or withdrawal of all securities and cash from the account held with the custodian. Upon termination of the account, any unearned fee will be refunded to the client.

#### **When an Outside Manager manages accounts:**

**Betterment** — When Betterment is our Outside Manager, the following applies:

The annual fees are negotiable and are prorated and paid as outlined in Betterment's client agreement. The management fee is a blended fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart (or as negotiated), applying the fee to the average daily account value during the previous quarter, resulting in a combined weighted fee.

In addition to our annual management fee, Betterment charges our clients an annual fee (currently 0.15%) for accounts held at Betterment Securities for which Betterment is our Outside Manager. When fees are debited from accounts, Betterment will debit both our fee and Betterment's fee simultaneously and pay our fee to us on your behalf. You will enter into a separate agreement with Betterment and Betterment Securities for their services. For stand-alone investment management services, in no event will the investment management fees charged by FPFoCo and Betterment exceed 3% of assets under management per year.

For example, an account valued at \$1,000,000 would pay an effective total annual fee of 1.025% or an equivalent annual dollar fee of \$10,250. A quarterly fee would be \$2,562.50 and is determined by the following calculation:  $((\$500,000 \times 0.95\%) + (\$500,000 \times 0.80\%)) \div 4 + ((\$1,000,000 \times 0.15\%) \div 4) = \$2,562.50$ . For another example, an account valued at \$5,000,000 would pay an effective total annual fee of 0.695% or an equivalent annual dollar fee of \$34,750. A monthly fee would be \$2,895.83 and is determined by the following calculation:  $((\$500,000 \times 0.95\%) + (\$500,000 \times 0.80\%) + (\$1,000,000 \times 0.65\%) + (\$1,000,000 \times 0.50\%) + (\$2,000,000 \times 0.35\%)) \div 12 + ((\$5,000,000 \times 0.15\%) \div 12) = \$2,895.83$ .

Only accounts where Betterment is our Outside Manager, held at Betterment Securities, are considered for aggregation purposes to determine the fee level that will apply for billing. Fees are charged from the date a new account is established through the date of termination.

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## **Financial Planning and Consulting**

For standalone financial planning and consulting services, our fees are as follows. Service package (basic, essential, comprehensive services) clients do not pay separately for financial planning and consulting services.

**Project Advice** package services are priced subjectively according to the degree of complexity associated with the client's situation and will be based on a negotiable hourly rate of no more than \$500 per hour or a negotiable fixed fee of no more than \$10,000 (please see the Item 5 section titled "Complexity," below).

**Open Advice** package services are priced subjectively according to the degree of complexity associated with the client's situation and will be based on a negotiable fixed fee of no more than \$25,000 (please see the Item 5 section titled "Complexity," below).

There are two components to the Open Advice package services fee: a one-time onboarding fee and an ongoing annual fee. The one-time onboarding fee considers the complexity and time associated with initially gathering and recording client information, creating an initial financial planning analysis, and disseminating an initial set of recommendations. The ongoing annual fee considers the availability of FPFoCo for in-person meetings, web conferences, phone calls, email consultations, financial planning analysis, and recommendations on an as-needed basis during the annual agreement term.

Both the one-time onboarding fee and the ongoing annual fee are priced in consideration of the Client's utilization of other services offered by FPFoCo. Generally, clients utilizing investment management services with AUM of \$500,000 or more will be offered Open Advice package services for no additional fee.

**Project Advice** package clients will pay half of the agreed upon fee on the effective date of the agreement and the balance upon delivery of the agreed services.

Clients may terminate Project Advice package financial planning and consulting services with written notice. Any unearned fees will be returned to the client.

**Open Advice** package clients will pay the one-time onboarding fee on the effective date of the agreement. The ongoing annual fee will be prorated and paid as follows:

1. In four equal quarterly installments, in advance, on the first day of the month after delivery of initial recommendations and then every three months thereafter.
2. In twelve equal monthly installments, in advance, on the first day of the month after delivery of initial recommendations and then every month thereafter.

Clients may terminate Open Advice package financial planning and consulting services with written notice. Any unearned fees will be returned to the client.

**Limited Scope** package services are not available on a standalone basis.

All balances due for financial planning and consulting fees may be paid by check, credit card, or electronic funds transfer, including the debiting of accounts under management if the client utilizes investment management services.

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## **Income Tax Preparation and Representation Services**

Pricing for income tax preparation and/or representation services is publically available on the Fort Collins Tax Service, LLC, website. Clients of FPFoCo are eligible for 15% - 100% discounts off of the advertised and/or customary price of some or all income tax preparation and/or representation services. These discounts are outlined in a separate written policy which may be updated from time to time. This policy is available upon request and on the FPFoCo and Fort Collins Tax Service, LLC websites.

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## **Other Types of Fees and Expenses**

Our 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, and other third parties such as 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 fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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## **Complexity**

For some services, FPFoCo evaluates the complexity of a client's financial situation in determining the fee the client will pay. FPFoCo's definition of complexity is the existence of circumstances, or lack thereof, that will require more time and effort of FPFoCo's advisors and staff to deliver valuable advice to a particular client.

The primary proxy that FPFoCo uses for complexity is investable net worth. That is: the client's net worth without regard to the client's primary residence, personal property assets, and personal property related liabilities (including credit cards, auto loans, and personal loans). Other factors that may impact complexity include, but are not limited to, the following:

- income and related tax considerations
- components of net worth, including high or low amounts of assets and/or liabilities
- marital and family status
- employment status and employee benefits considerations
- business ownership
- real estate and other illiquid investment ownership
- the custodian(s) where securities are held
- overall income tax situation
- recent or upcoming relocation
- number of financial goals
- risk management plan or lack thereof
- estate plan or lack thereof
- timing of financial independence/retirement

## Item 6: Performance-Based Fees and Side-by-Side Management

Fees are not based on a share of the capital gains or capital appreciation of managed securities. We do not offer or accept performance-based fees.

## Item 7: Types of Clients

We provide investment management, financial planning and consulting services, and comprehensive services to individuals and high net-worth individuals.

We do not have a minimum account or relationship size requirement, however we do have a minimum fee for comprehensive services. Please see Item 5 for additional details.

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

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### Methods of Analysis

When analyzing appropriate investments for client portfolios, our primary consideration is the investment's ability to fit well within a broadly diversified investment portfolio constructed based on the principles of Modern Portfolio Theory ("MPT").

The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

Additionally, for half of the allocation to stocks/equities in client portfolios, we utilize third-party trend analysis to make rules-based allocation changes quarterly. These changes seek to over-allocate towards investment categories which have positive momentum and upward trend and under-allocate and/or avoid investment categories which have negative momentum and downward trend.

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### Investment Strategies

**When FPFoCo manages accounts:** We primarily practice active allocation strategies utilizing passive investment vehicles. This involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes

are considered for placement into the portfolio. The funds that are used to build portfolios are typically index mutual funds or exchange traded funds.

This type of investment management is generally characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs). Portfolios are typically rebalanced quarterly, with a re-evaluation of the asset classes utilized, portfolio correlation, risk, and return. We rely on our own and third-party data when evaluating these factors.

Investment policy statements created for clients will indicate a target asset allocation, based on a client's unique circumstances, risk tolerance, and time horizon. A client's actual invested asset allocation may deviate from this target asset allocation based on our evaluation of financial markets and various investment asset classes, as well as other factors, such as income tax considerations. At any given time, a client portfolio may be invested between 0% and 100% relative to the target asset allocation specified in the investment policy statement – where 0% means that none of the client's account is invested and 100% means that all of the client's account is invested.

**When an Outside Manager manages accounts:** We may refer clients to an Outside Manager. Our analysis of outside managers involves the examination of the experience, expertise, investment philosophies, and past performance of the outside managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the manager's compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that he or she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in an outside manager's portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

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## Material Risks Involved

**All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable, or find buyers at any price.

**Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same. When your portfolio is not fully invested, which it may not be from time to time and possibly for extended period of time, inflation becomes a greater risk.

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## Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Commercial Paper** is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

**Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

**Bank Obligations** including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Options and other derivatives** carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the clients invest.

**Investment Companies Risk.** When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which client's invest.

## **Item 9: Disciplinary Information**

The firm and its management have not been involved in any criminal or civil action, administrative enforcement proceedings, or legal or disciplinary events related to past or present clients.

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

Managing Member Jason Speciner is a federally licensed tax preparer and Enrolled Agent. Approximately 25% of Mr. Speciner's time is spent on the preparation of tax returns and related activities, including the representation of clients before the Internal Revenue Service and/or state or local taxing authorities. Clients of FPFoCo are offered income tax preparation and representation services through Fort Collins Tax Service, LLC. Details are outlined in Item 5 of this brochure, under the sub-section entitled Income Tax Preparation and Representation Services.

No FPFoCo employee is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No FPFoCo employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

No FPFoCo employee is licensed, or have an application pending to become licensed, as an insurance agent or producer.

FPFoCo does not have any related parties. As a result, we do not have a relationship with any related parties.

FPFoCo only receives compensation directly from clients. We do not receive compensation from any outside source.

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### **Recommendations or Selections of Other Investment Advisors**

As referenced in Item 4 of this brochure, FPFoCo recommends clients to Outside Managers to manage their accounts. In the event that we recommend an Outside Manager, please note that we do not share in their advisory fee. Our fee is separate and in addition to their compensation (as noted in Item 5) and will be described to you prior to engagement. You are not obligated, contractually or otherwise, to use the services of any Outside Manager we recommend. Additionally, FPFoCo will only recommend an Outside Manager who is properly licensed or registered as an investment advisor.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

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

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect credit of the profession.

- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any client or prospective client upon request.

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### **Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc.

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

Our firm and its “related persons” may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates’ transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

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### **Trading Securities At/Around the Same Time as Client’s Securities**

From time to time, our firm or its “related persons” may buy or sell securities for themselves at or around the same time as clients. We will not trade non-mutual fund securities 3 business days prior to the same security for clients.

## **Item 12: Brokerage Practices**

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### **Factors Used to Select Custodians and/or Broker-Dealers**

Financial Planning Fort Collins does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

- *Research and Other Soft-Dollar Benefits*  
We currently receive soft dollar benefits by nature of our relationship with MTG, LLC dba Betterment Securities (“Betterment Securities”).
- *Brokerage for Client Referrals*  
We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.
- *Clients Directing Which Broker/Dealer/Custodian to Use*  
We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients money over using a lower-cost custodian.

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## The Custodians and Brokers We Use

FPFoCo does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw advisory fees from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank.

### **Betterment**

We may recommend that our clients use MTG, LLC dba Betterment Securities (“Betterment Securities”), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Betterment Securities. Betterment Securities will hold your assets in a brokerage account and buy and sell securities when we and/or you instruct them to. While we may recommend that you use Betterment Securities as custodian/broker, you will decide whether to do so and will open your account with Betterment Securities by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Betterment Securities, then we cannot manage your account on Betterment For Advisors (defined below).

### **Your Brokerage and Custody Costs**

For our clients' accounts that Betterment Securities maintains, Betterment Securities generally does not charge you separately for custody services but is compensated as part of the Betterment For Advisors (defined below) platform fee, which is a percentage of the dollar amount of assets in the account in lieu of commissions. We have determined that having Betterment Securities execute trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “Factors Used to Select Custodians and/or Broker-Dealers”).

### **Services Available to Us via Betterment For Advisors**

Betterment Securities serves as broker-dealer to Betterment For Advisors, an investment and advice platform serving independent investment advisory firms like us (“Betterment For Advisors”). Betterment For Advisors also makes available various support services which may not be available to Betterment's retail customers. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Betterment For Advisors' support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Betterment For Advisors' support services:

1. **SERVICES THAT BENEFIT YOU.** Betterment For Advisors includes access to a range of investment products, execution of securities transactions, and custody of Client assets through Betterment Securities. Betterment Securities' services described in this paragraph generally benefit you and your account.
2. **SERVICES THAT MAY NOT DIRECTLY BENEFIT YOU.** Betterment For Advisors also makes available to us other products and services that benefit us, but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts, such as software and technology that may:
  - a. Assist with back-office functions, recordkeeping, and Client reporting of our clients' accounts.
  - b. Provide access to Client account data (such as duplicate trade confirmations and account statements).
  - c. Provide pricing and other market data.
  - d. Assist with back-office functions, recordkeeping, and Client reporting.

3. SERVICES THAT GENERALLY BENEFIT ONLY US. By using Betterment For Advisors, we will be offered other services intended to help us manage and further develop our business enterprise. These services include:
  - a. Educational conferences and events.
  - b. Consulting on technology, compliance, legal, and business needs.
  - c. Publications and conferences on practice management and business succession.

### **Our Interest in Betterment Securities' Services**

The availability of these services from Betterment For Advisors benefits us because we do not have to produce or purchase them. In addition, we don't have to pay for Betterment Securities' services. These services may be contingent upon us committing a certain amount of business to Betterment Securities in assets in custody. We may have an incentive to recommend that you maintain your account with Betterment Securities, based on our interest in receiving Betterment For Advisors and Betterment Securities' services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Betterment Securities as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities' services and not Betterment For Advisors and Betterment Securities' services that benefit only us.

### **Betterment for Advisors Trading Policy**

When using the Betterment for Advisors platform, we and you are subject to the trading policies and procedures established by Betterment. These policies and procedures limit our ability to control, among other things, the timing of the execution of certain trades (including in response to withdrawals, deposits, or asset allocation changes) within your account. You should not expect that trading on Betterment is instant, and, accordingly, you should be aware that Betterment does not permit you or us to control the specific time during a day that securities are bought or sold in your account (i.e., to "time the market"). Betterment describes its trading policies in Betterment LLC's Form ADV Part 2A. As detailed in that document, Betterment generally trades on the same business day as it receives instructions from you or us. However, transactions will be subject to processing delays in certain circumstances. In particular, orders initiated on non-business days and after markets close generally will not transact until the next business day. Betterment also maintains a general approach of not placing securities orders during approximately the first thirty minutes after the opening of any market session. Betterment also generally stops placing orders arising from allocation changes in existing portfolios approximately thirty minutes before the close of any market session. Betterment continues placing orders associated with deposit and withdrawal requests until market close. Betterment maintains a general approach of not placing orders around the time of scheduled Federal Reserve interest rate announcements. Furthermore, Betterment may delay or manage trading in response to market instability. For further information, please consult Betterment LLC's Form ADV Part 2A.

### **TD Ameritrade**

FPFoCo participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent [and unaffiliated] SEC-registered broker-dealer. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance, and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. Please see the disclosure under Item 14 below.

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## **Aggregating (Block) Trading for Multiple Client Accounts**

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as “block trading”). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

Outside Managers used by FPFoCo may block client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

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

Client accounts under our management will be reviewed annually by the client’s servicing advisor. Investment management services and comprehensive services clients will be offered an opportunity to review their portfolio with their advisor semi-annually. The account is reviewed with regards to the client’s investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

FPFoCo will provide digital access to account performance reports and will mail a physical copy of these reports at the client’s request. We urge clients to compare these reports against the account statements they receive from their custodian.

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

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for client referrals

We receive a non-economic benefit from Betterment For Advisors and Betterment Securities in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Betterment Securities. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of Betterment For Advisors and Betterment Securities’ products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

As disclosed under Item 12, above, Advisor participates in TD Ameritrade’s institutional customer program and Advisor may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between Advisor’s participation in the program and the investment advice it gives to its clients, although Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services;

access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the number of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

### **Item 15: Custody**

FPFoCo does not accept custody of client funds except in the instance of withdrawing client fees.

For client accounts in which FPFoCo directly debits the fee:

1. FPFoCo will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
2. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the fee.
3. The client will prove written authorization to FPFoCo, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

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

For those client accounts where we provide investment management services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a limited power of attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client.

FPFoCo will have the discretion to facilitate the selection of, and changes to, the Betterment For Advisors portfolio allocation. Betterment For Advisors provides software tools for advisors to facilitate the purchase and sale of securities in the Client's accounts, including the amounts of

securities to be bought and sold to align with the Client's goals and risk tolerance, through a series of 101 incremental model portfolio allocations ranging from 0% to 100% in equities.

### **Item 17: Voting Client Securities**

We do not vote Client proxies. Therefore, clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

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

A balance sheet is not required to be provided because FPFoCo does not serve as a custodian for client funds or securities and FPFoCo does not require prepayment of fees of more than \$500 per client and six months or more in advance. FPFoCo has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients. FPFoCo and its affiliates have no bankruptcies in the past 10 years.

FPFoCo is voluntarily disclosing that the firm obtained a loan of \$30,000 under the Paycheck Protection Program (PPP) during the COVID-19 global pandemic in April, 2020. At the time of the loan application, Mr. Speciner truthfully certified that "economic uncertainty makes this loan request necessary to support the ongoing operations" of the firm. FPFoCo believes that applying for and accepting the loan was a prudent measure to ensure that the firm had access to working capital at favorable terms during a period of high economic uncertainty and in an effort to avoid entering an adverse financial condition in the future. FPFoCo expects to meet the conditions for forgiveness of the loan under the terms of the PPP.

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

Jason S. Speciner, CFP<sup>®</sup>, EA, is 100% owner of FPFoCo. Education and business background, including any outside business activities and disclosable events for all management and supervised persons can be found in the Supplement to this Brochure (Part 2B of Form ADV).

Other than as disclosed in Item 10 above, FPFoCo does not engage in any other business activities.

Neither FPFoCo nor any of its investment adviser representatives receives any performance based fees.

Neither FPFoCo nor any of its management persons or investment adviser representatives has been involved in (a) any award or otherwise being found liable in any arbitration claim alleging damages in excess of \$2,500, or (b) any award or otherwise being found liability in a civil, self-regulatory organization, or administrative proceeding, involving an investment or investment related business or activity; fraud, false statements, or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices.

Neither FPFoCo nor any of its management persons have any relationship or arrangement with any issuer of securities.

**Item 1 - Cover Page**

**SUPERVISED PERSON BROCHURE**

FORM ADV PART 2B

Jason S. Speciner, CFP<sup>®</sup>, EA

**Fort Collins Tax Service, LLC  
dba**

**Financial Planning Fort Collins**

**Office Address:**

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Fort Collins, CO 80525

Tel: 970-225-0504

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[info@fpfoco.com](mailto:info@fpfoco.com)

[FinancialPlanningFortCollins.com](http://FinancialPlanningFortCollins.com)

This brochure supplement provides information about Jason S. Speciner and supplements the Fort Collins Tax Service, LLC dba Financial Planning Fort Collins's brochure. You should have received a copy of that brochure. Please contact Jason S. Speciner if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Jason S. Speciner (CRD #4781020) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**January 25, 2021**

## Brochure Supplement (Part 2B of Form ADV)

Jason S. Speciner, CFP®, EA

- Year of birth: 1982

### Item 2 - Educational Background and Business Experience

Educational Background:

- Colorado State University; Bachelor of Science in Business Administration; 05/2004

Business Experience:

<b>Fort Collins Tax Service, LLC dba Financial Planning Fort Collins</b> Investment Advisor Representative/Chief Compliance Officer	05/2016 to Present
<b>Fort Collins Tax Service, LLC</b> Managing Member/Tax Preparer	11/2014 to Present
<b>Jason Speciner, Sole Proprietor</b> Tax and Financial Industry Consultant	11/2015 to Present
<b>Jason Speciner, Sole Proprietor</b> Notary	06/2009 to Present
<b>Jason Speciner, Sole Proprietor</b> Non-producing life, health, and variable insurance licensee	10/2017 to 01/2018
<b>Cambridge Investment Research Advisors, Inc.</b> Investment Advisor Representative	07/2013 to 10/2017
<b>Cambridge Investment Research Inc.</b> Registered Representative	07/2013 to 10/2017
<b>Jason Speciner, Sole Proprietor</b> Insurance Agent	05/2004 to 10/2017
<b>Long Green Planning Group, LLC</b> dba for Registered Representative & Investment Advisor Representative Manager	08/2010 to 07/2015
<b>Cetera Advisor Networks LLC</b> Registered Representative/Investment Advisor Representative	07/2007 to 07/2013
<b>Jason S. Speciner, LLC</b> dba for Registered Representative & Investment Advisor Representative Owner	07/2007to 12/2010
<b>Waddell &amp; Reed, Inc.</b> Investment Advisor Representative	06/2004 to 07/2007
<b>Waddell &amp; Reed, Inc.</b> Registered Representative	05/2004 to 07/2007

## Professional Certifications

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

**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 62,000 individuals have obtained CFP® certification in the United States.

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – 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.

Enrolled Agent (EA): Enrolled Agents are enrolled by the Internal Revenue Service and authorized to use the EA designation. EA enrollment requirements:

- Successful completion of the three-part IRS Special Enrollment Examination (SEE), or completion of five years of employment by the IRS in a position which regularly interpreted and applied the tax code and its regulations.
- Successfully pass the background check conducted by the IRS.

### **Item 3 - Disciplinary Information**

Mr. Speciner has no disciplinary events to disclose.

### **Item 4 - Other Business Activities Engaged In**

Managing Member Jason Speciner is a federally licensed tax preparer and Enrolled Agent. Approximately 25% of Mr. Speciner's time is spent on the preparation of tax returns and related activities, including the representation of clients before the Internal Revenue Service and/or state or local taxing authorities. Clients of FPFoCo are offered income tax preparation and representation services through Fort Collins Tax Service, LLC. Details are outlined in Item 5 of the firm's brochure Part 2A, under the sub-section entitled Income Tax Preparation and Representation Services.

Mr. Speciner is a Notary Public.

In addition to his other business activities, Mr. Speciner provides opinion and advice to information service firms and their clients about the financial service and tax service industries. There is no conflict of interest as advisory clients of Financial Planning Fort Collins are not solicited for services for his consulting business.

### **Item 5 - Additional Compensation**

Mr. Speciner receives additional compensation in his role as a tax preparer and business consultant; however, he receives no performance-based compensation.

Mr. Speciner does not receive any additional compensation for performing advisory services other than what is disclosed in the Form ADV Part 2A of FPFoCo, Item 5.

### **Item 6 - Supervision**

Since Mr. Speciner is the sole owner of Financial Planning Fort Collins, he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. If you have any questions, he can be reached at the telephone number shown on the cover page of this document.

### **Item 7 - Requirements for State-Registered Advisors**

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

## SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

Regina M. Neenan, FPQP™

**Fort Collins Tax Service, LLC**  
dba

# Financial Planning Fort Collins

**Office Address:**

375 E. Horsetooth Road,  
Building 3, Suite 203  
Fort Collins, CO 80525

Tel: 970-225-0504

Fax: 970-658-0050

[info@fpfoco.com](mailto:info@fpfoco.com)

[FinancialPlanningFortCollins.com](http://FinancialPlanningFortCollins.com)

This brochure supplement provides information about Regina M. Neenan and supplements the Fort Collins Tax Service, LLC dba Financial Planning Fort Collins's brochure. You should have received a copy of that brochure. Please contact Regina M. Neenan if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Regina M. Neenan (CRD #7167307) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**January 25, 2021**

## Brochure Supplement (Part 2B of Form ADV)

Regina M. Neenan, FPQP™

- Year of birth: 1987

### Item 2 - Educational Background and Business Experience

Educational Background:

- Clarke College; Bachelor of Arts in Spanish; 05/2010
- University of Wisconsin-Platteville; Bachelor of Arts in Media Studies; 05/2015

Business Experience:

<b>Fort Collins Tax Service, LLC dba Financial Planning Fort Collins</b> Client Service and Engagement Specialist, Paraplanner	10/2019 to Present
<b>Fort Collins Tax Service, LLC dba Financial Planning Fort Collins</b> Client Service and Engagement Specialist	11/2018 to 10/2019
<b>Fort Collins Tax Service, LLC dba Financial Planning Fort Collins</b> Consumer Engagement Associate	08/2018 to 11/2018
<b>Self-Employed</b> Content Manager	07/2018 to 10/2018
<b>Active Blogs</b> Content Manager	04/2017 to 07/2018
<b>Active Blogs</b> Quality Control Editor	07/2015 to 07/2017
<b>University of Wisconsin - Platteville</b> Student Assistant	01/2015 to 06/2017
<b>Younkers/Estee Lauder</b> Beauty Consultant	06/2010 to 10/2014
<b>Moondog Music</b> Salesperson	06/2010 to 10/2014
<b>Clarke University (College)</b> Student Assistant	05/2008 to 10/2010

### Professional Certifications

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

Financial Paraplanner Qualified Professional (FPQP™): Individuals who hold the FPQP™ designation have completed a course of study encompassing the financial planning process, the five disciplines of financial planning and general financial planning concepts, terminology and product categories. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

### Item 3 - Disciplinary Information

Ms. Neenan has no disciplinary events to disclose.

**Item 4 - Other Business Activities Engaged In**

None

**Item 5 - Additional Compensation**

Ms. Neenan does not receive any additional compensation for performing advisory services other than what is disclosed in the Form ADV Part 2A of FPFoCo, Item 5.

**Item 6 - Supervision**

Ms. Neenan is under direct supervision of Jason S. Speciner, CFP®, EA. She will adhere to the policies and procedures as described in the firm's Compliance Manual. If you have any questions, Mr. Speciner can be reached at the telephone number shown on the cover page of this document.

**Item 7 - Requirements for State-Registered Advisors**

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

## SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

Daniel C. Andrews, CFP®

**Fort Collins Tax Service, LLC**  
dba

# Financial Planning Fort Collins

**Office Address:**

375 E. Horsetooth Road,  
Building 3, Suite 203  
Fort Collins, CO 80525

Tel: 970-225-0504

Fax: 970-658-0050

[info@fpfoco.com](mailto:info@fpfoco.com)

[FinancialPlanningFortCollins.com](http://FinancialPlanningFortCollins.com)

This brochure supplement provides information about Daniel C. Andrews, CFP® and supplements the Fort Collins Tax Service, LLC dba Financial Planning Fort Collins's brochure. You should have received a copy of that brochure. Please contact Jason S. Speciner if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Daniel C. Andrews (CRD #6134103) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**January 25, 2021**

## Brochure Supplement (Part 2B of Form ADV)

Daniel Craig Andrews, CFP®

- Year of birth: 1985

### Item 2 - Educational Background and Business Experience

Educational Background:

- The University of Denver; Bachelor of Science in Business Administration; 08/2008

Business Experience:

**Fort Collins Tax Service, LLC dba Financial Planning Fort Collins**

Investment Advisor Representative

01/2020 to Present

**Poudre School District**

Substitute Teacher

09/2019 to Present

**Kinard Middle School**

Assistant Football Coach

08/2019 to Present

**Whitefield Consulting Management**

Independent Consultant

01/2016 to Present

**Well-Rounded Success**

Managing Member, Investment Advisor Representative,  
and Chief Compliance Officer

04/2014 to 01/2020

**YoungPro Elite**

Chapter Leader and Curriculum Developer

07/2014 to 07/2017

**Wells Fargo Advisors Financial Network, LLC**

Registered Representative, Investment Advisor Representative

10/2012 to 11/2015

**Purcell Capital Management**

Financial Advisor

10/2012 to 11/2015

**Unemployed/Extended Travel**

04/2012 to 10/2012

**Aspen Skiing Company**

Night Auditor, Night Manager, and Athletic Club Manager

03/2009 to 04/2012

### Professional Certifications

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- 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.

### **Item 3 - Disciplinary Information**

Mr. Andrews has no disciplinary events to disclose.

### **Item 4 - Other Business Activities Engaged In**

Mr. Andrews is a substitute teacher and assistant football coach.

In addition to his other business activities, Mr. Andrews provides labor, opinion, and advice to Whitefield Consulting Management.

### **Item 5 - Additional Compensation**

Mr. Andrews receives additional compensation in his role as a substitute teacher, assistant football coach, and business consultant; however, he receives no performance-based compensation.

Mr. Andrews does not receive any additional compensation for performing advisory services other than what is disclosed in the Form ADV Part 2A of FPFoCo, Item 5.

**Item 6 - Supervision**

Mr. Andrews is under direct supervision of Jason S. Speciner, CFP®, EA. He will adhere to the policies and procedures as described in the firm's Compliance Manual. If you have any questions, Mr. Speciner can be reached at the telephone number shown on the cover page of this document.

**Item 7 - Requirements for State-Registered Advisors**

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None