Investment Advisor Brochure and Supplement Form ADV Parts 2A and 2B

Financial Advisor For You, LLC A Registered Investment Advisor

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www.FinancialAdvisorForYou.com

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This brochure provides information about Financial Advisor For You's (FAFY) qualifications and business practices as well as a supplement describing its managing member, Michael S. Wroblewski. If you have any questions about the contents of this Brochure, please contact Michael Wroblewski at (202) 257-6499. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

FAFY is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. Additional information about the firm is available on the SEC's website: www.adviserinfo.sec.gov.

Item 2 – Material Changes

Since the last update of February 24, 2019, there has been a slight increase in the professional fees – see Item 5. In addition, FAFY has revised its Code of Ethics to comply with the CFP Board's Code of Ethics and Standards of Conduct – see Item 11.

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Item 4 – Advisory Business

Financial Advisor For You, LLC (FAFY) is a registered investment advisor domiciled and registered in the District of Columbia. Michael Wroblewski, CFP[®], JD, is the owner of the firm. FAFY was formed as an LLC in February 2014 and became licensed as an investment adviser in 2015. Starting in 2009, the business was a sole proprietorship that offered specialized advice regarding student loans and health insurance issues.

FAFY offers fee-only financial planning services. FAFY does not sell products, manage money, provide investment management or supervision, or receive compensation for referrals. FAFY provides comprehensive financial planning advice that involves, cash flow management, debt reduction strategies, real estate advice, insurance advice (life, health, disability, long-term care property), college planning (student loans and 529 plans), retirement advice, investment advice, tax planning, and estate planning. FAFY maintains a website (www.financialadvisorforyou.com) and blog that describes various financial planning topics, including investment strategies. The website is public facing and does not require a fee or subscription to access.

Upon request, FAFY provides educational and workshops on financial planning topics such as tax planning, cash management, and investment strategies. Fees, if any, are negotiable the scope and nature of the workshop.

FAFY's revenues involve providing comprehensive financial planning advice (including retirement planning), in which investment advice is one component of the entire financial situation assessment. The investment consultation does not involve continuous investment monitoring. FAFY does not actively direct client assets, but rather provides advice for clients to manage their investments on their own.

The comprehensive financial planning process involves the following steps:

Review and Evaluation: I review and analyze all information furnished to me in the client questionnaire, supporting documents, and in client discussions, including the client's personal information, economic assumptions (*e.g.*, salary projections), insurance coverage, asset and investment information, debt obligations, income tax information, retirement information, and estate planning information.

Written Plan: Based on a review and analysis of this information, I provide a written analysis of the client's current financial situation. This analysis will include a current balance sheet, a cash flow statement, a retirement analysis, an insurance analysis, an estate document analysis, and a set of financial ratios to illustrate the client's current financial position, as appropriate. Based on the client's personal goals and objectives, I also prepare, in writing, preliminary recommendations to address the client's concerns and issues. The recommendations relate to the adequacy of the client's savings and investments, cash flow management including debt

repayment and tax implications, sufficiency of insurance coverage, education funding, retirement planning, and estate planning.

I then meet with the client to discuss the analysis and I provide a preliminary draft of the recommended strategies. Following agreement on the client's personal financial goals and the strategies to be used to achieve them, I then provide a summary of our plan and a list of action items for the client to implement. I am available to help implement the plan once the plan is finalized. Ideally, we complete this process within three months.

Item 5 – Fees and Compensation

The fee for comprehensive financial planning services is a fixed fee that can range between \$1,100 and \$1,600, depending on the complexity of the client's circumstances and planning services required. Fifty percent of the fee is payable when the financial documents are delivered in order to prepare the written analysis and recommendations and the remaining fifty percent is payable with the delivery of the analysis and recommended plan. The fees are enumerated in the financial planning engagement letter signed by both FAFY and the client. FAFY does not bill for these fees. Fees are negotiable depending upon the specific client's situation. There will be no payment of advisory fees six months or more in advance of the delivery of services and in excess of \$500 per client.

It is FAFY's practice to complete the comprehensive written plan within two to three weeks from the initial meeting and payment of the first fifty percent of the fees.

FAFY offers regular financial planning check-ins during the year. The fees for these services vary on the scope and types of services offered. A one-year commitment is required. FAFY will bill the client for these services after the check-in has occurred.

FAFY offers one-time financial plan updates for clients that already have a FAFY-developed comprehensive financial plan. The fees for this one-time check-in are negotiable and depend on the scope of the update.

FAFY also offers hourly consultations with clients on specific topics, such as cash flow management, insurance coverage, first time home buying, debt repayment, and retirement investment selection. Hourly consultations fees are \$250/hour.

Fees for financial planning seminars range between \$0 and \$350/seminar, depending upon the scope of the topics covered.

If FAFY does not perform the personal financial planning services or seminar services agreed upon, FAFY will refund the fees paid under the signed client contract. To obtain the fees paid, the client must send an email to FAFY requesting the refund. FAFY will promptly refund the fees paid.

Item 6 – Performance-Based Fees and Side-by-Side Management

We do not charge advisory fees on a share of the capital appreciation of the funds or securities in a client account (so-called performance based fees). Our advisory fee compensation is charged only as disclosed above in Item 5.

Item 7 – Types of Clients

FAFY provides services to individuals, sole proprietorships, limited liability companies, non-profit organizations, and corporations in need of independent financial planning services.

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

A. Methods of Analysis

If FAFY is engaged to provide investment consultation as part of a comprehensive financial plan ore retirement analysis, we will evaluate several sources of data that are provided by the client:

- Current financial situation
- Current and long-term investment needs
- Tolerance for risk
- Investment options available in any retirement plan
- Expenses of the investment options available

We will make asset allocation and investment recommendations based primarily on these factors. We will then discuss with the client how to meet their objectives while at the same time minimizing client risk exposure and expenses.

Recommendations will be based on publicly available reports, analysis and research materials, and various industry subscription services, including Morningstar, Bloomberg, Vanguard, Fidelity and other providers of investment information and analysis. We are up to date on current macro and micro economic news through our subscriptions to newspapers such as the Wall Street Journal, the New York Times, and the Washington Post. We also read industry publications such as the Journal of Financial Services Professionals and the Journal of Financial Planning. We urge clients to keep abreast of market issues by reading various money blogs (Nerd Wallet, Student Loan Hero, etc.) and Kiplinger magazine and to ask any questions about how recent developments can affect their financial lives.

B. Investment Strategies

FAFY will recommend an approach that relies on low-cost, passive investments that mirror their proportional share of the overall securities market to meet the client's specific investment objectives and risk considerations. Portfolios will be constructed with prevailing long-term

trends in mind. In situations such as in employer qualified plans, where investment choices are limited by the plan design, we will recommend the most cost-effective choice that captures the portion of the securities market that best match the client's goals.

FAFY will assist in rebalancing a client portfolio in an attempt to maintain an optimal asset allocation while still being tax efficient and limiting trading costs. We believe that a disciplined regularized approach is the best, long-term strategy. Short-term trends and strategies will not be employed unless necessary in accordance with client mandates. FAFY will not pursue strategies that are speculative in nature.

C. Risk of Loss

General Investment Risks – Investing in securities involves certain risks even over the long-term. FAFY tries to reduce these risks by eliminating "company-specific" risks by using an approach that mirrors market long-term returns. However, markets fluctuate constantly and the securities mirroring these markets will fluctuate in value or lose value. Thus, an index strategy may not be the most appropriate for every client. Clients should be prepared to bear the potential risk of loss as the market following this type of strategy. FAFY will assist clients to determine an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a client will meet their investment goals.

Each client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate investment strategy. Client participation in this process, including full and accurate disclosure of requested information as noted above, is essential for the analysis of a client's account. FAFY relies on the financial and other information provided by the client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the client to inform FAFY of any changes in financial condition, goals or other factors that may affect their analysis. FAFY will employ investment strategies that do not involve any significant or unusual risk other than domestic equity and international market risks.

Item 9 – Disciplinary Information

As of the date of this Brochure, there are no legal, regulatory or disciplinary events involving FAFY or any of its employees.

Item 10 – Other Financial Industry Activities and Affiliations

As of the date of this Brochure, our management persons do not have any other financial industry activities or affiliations.

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

The firm has adopted a Code of Ethics that sets forth the policies of ethical conduct for all FAFY personnel. The Code is consistent with the Certified Financial Planner Board of Standards and Code of Ethics, with one change regarding conflicts of interest (see Principle 4). FAFY will provide a copy of its Code of Ethics to a client or prospective upon their request.

Principle 1 – Act with honesty, integrity, competence, and diligence.

Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. CFP certificants are placed in positions of trust by clients, and the ultimate source of that trust is the CFP[®] professional's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion, but integrity cannot co-exist with deceit or subordination of one's principles. Competence means attaining and maintaining an adequate level of knowledge and skill, and application of that knowledge and skill in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

Principle 2 – Act in the client's best interest.

At all times when providing financial advice to a client, a CFP[®] professional must act as a fiduciary, and therefore, act in the best interests of the client. The following duties must be fulfilled:

a. Duty of Loyalty. A CFP® professional must:

i. Place the interests of the client above the interests of the CFP[®] professional and the CFP[®] Professional's Firm;

ii. Avoid conflicts of interest; and

iii. Act without regard to the financial or other interests of the CFP[®] professional, the CFP[®] Professional's Firm, or any individual or entity other than the client, which means that a CFP[®] professional acting under a conflict of interest continues to have a duty to act in the best interests of the client and place the client's interests above the CFP[®] professional's.

b. Duty of Care. A CFP[®] professional must act with the care, skill, prudence, and diligence that a prudent professional would exercise in light of the client's goals, risk tolerance, objectives, and financial and personal circumstances.

c. Duty to Follow Client Instructions. A CFP[®] professional must comply with all objectives, policies, restrictions, and other terms of the engagement and all reasonable and lawful directions of the client.

Principle 3 – Exercise due care.

CFP[®] professional must act with the care, skill, prudence, and diligence that a prudent professional would exercise in light of the client's goals, risk tolerance, objectives, and financial and personal circumstances.

Principle 4 – Avoid conflicts of interest.

Although the CFP Board's Code of Ethics and Standards permits disclosure and management of conflicts of interest, FAFY believes that disclosures in this context are ineffective. Accordingly, FAFY personnel will avoid all conflicts of interest and always place the client's interests first.

Principle 5 – Maintain the confidentiality, and protect the privacy of client information.

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

Principle 6 – Act in a manner that reflects positively on the financial planning procession and CFP[®] certification.

Professionalism requires behaving with dignity and courtesy to clients, fellow professionals, and others in business-related activities. CFP® professionals cooperate with fellow CFP® professionals to enhance and maintain the profession's public image and improve the quality of services. CFP® professionals make a continuing commitment to learning and professional improvement.

FAFY is a fee-only advisor, who, in all circumstances, is compensated solely by the client, with neither the advisor nor any related party receiving compensation that is contingent on the purchase or sale of any financial product. FAFY does not engage in any transactions where it has a financial interest, including, but not limited to commissionable securities transactions, buying securities from or selling securities to its clients.

As a fee-only registered investment advisor ("RIA"), FAFY does not have a broker-dealer relationship and has no incentive to sell products of any kind to its clients.

Item 12 – Brokerage Practices

FAFY is not affiliated with and does not maintain an ongoing agreement with a "service provider" such as a brokerage, bank, or custodian. When engaged to provide investment

consultation services, we will first use the service provider with which the client's assets are currently maintained. Should the client prefer a new provider or need to consolidate accounts, the recommendations will be based on the client's needs and ease of administration. FAFY will recommend service providers that do not charge the client a fee for maintaining their investment assets.

FAFY does not receive research or other products or service in connection with client securities transactions ("soft dollar benefits").

All compensation paid to the firm is paid directly by the client, and therefore the firm does not receive any additional compensation when a client engages a recommended service provider.

FAFY does not engage in a directed brokerage involving its accounts. Due to the nature of the firm's financial planning services, each client is encouraged to use any particular service provider to execute some or all of their transactions for his/her account. Each client is responsible for negotiating the terms for the account. FAFY does not conduct independent due diligence or obtain better execution services or prices from these service providers, or aggregate client transactions for execution.

Item 13 - Review of Accounts

Accounts are reviewed when the client engages in an update of their financial plan, which includes an investment account update. It is the client's responsibility to initiate these reviews. The scope of the review includes a review of the client's investment objectives and then within that context, the review includes, among other items, a written assessment of the overall investment asset allocation, the performance of the assets included in the portfolio (including the fees related to the funds/assets selected), and recommendations on realignment consistent with the client's investment objectives.

FAFY does not provide regular written reports, but rather provides a written investment account review in the context of an update to a client's financial plan.

FAFY's managing member and sole employee, Michael S. Wroblewski, conducts the update of a client's financial plan.

Item 14 - Client Referrals and Other Compensation

FAFY does not pay any person directly or indirectly for the introduction or acquisition of clients.

Item 15 – Custody

FAFY does not have custody of client's funds or securities. All assets for your accounts are held by a qualified and independent custodian (bank, broker, trust company or insurance company).

FAFY urges clients to maintain the records and statements provided by the service providers that maintain custody of their assets.

Item 16 – Investment Discretion

FAFY does not directly provide continuous investment management or investment supervisory services, nor does it engage in discretionary trading within a client account.

Item 17 – Voting Client Securities (i.e. Proxy Voting)

FAFY does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Rather, clients receive their proxies and other solicitations directly from their custodians or transfer agents. Clients with questions about proxies and related material are welcome to contact FAFY through email or other regular communication channels.

Item 18 – Financial Information

FAFY has not filed for bankruptcy at any time.

Due to the nature of the firm's services, an audited balance sheet is not required nor included in this disclosure. No further material financial information is required.

Item 19 – Requirements for State-Registered Advisors

A. FAFY's managing member and sole employee is Michael S. Wroblewski. He received his J.D. from the University of Texas School of Law, and a M.P.A. from the Lyndon Baines Johnson School of Public Affairs (1992). He received his B.S. (computer science) and B.B.A. (finance) from Loyola University in Maryland (1985). He received his Certified Financial Planner [™] designation in 2014.

He was an antitrust attorney with the Federal Trade Commission for over a decade (1998-2006 and (2008-2011) and developed and implemented policies to benefit consumers in a variety of industries including, telecommunications, electric power, and pharmaceuticals. From 2006-2008, he was the project director for Consumer Education at Consumers Union, the non-profit publisher of Consumer Reports. He developed web-based tools to help consumers buy health insurance and to assist parents and students understand student loans and college financing. From 2011 to 2014, he directed Medicare's implementation of how to rate doctors and hospitals on the cost and quality of care furnished so that Medicare could differentiate payments based on the value of the services furnished.

He is a member of the District of Columbia Bar Association and the Financial Planning Association.

B. FAFY and Michael S Wroblewski do not engage in other business activities.

C. FAFY does not use performance-based fees.

D. Mr. Wroblewski has not been found liable in an arbitration claim, civil, self-regulatory organization, or administration proceeding. Mr. Wroblewski has not filed a bankruptcy petition.

E. Neither FAFY nor its managing member has any relationship or arrangement with any issue of securities.

Brochure Supplement

This Brochure Supplement provides information about Michael S. Wroblewski that supplements the Financial Advisor For You brochure. You should have received a copy of that brochure or can obtain it electronically at <u>http://www.financialadvisorforyou.com/about-michael-wroblewski/</u>. Please contact Michael Wroblewski if you have any questions about the contents of this supplement.

Additional Information about Michael S. Wroblewski is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.

Item 2 - Educational Background and Business Experience

Michael S. Wroblewski (born January 3, 1963, age 57) received his J.D. from the University of Texas School of Law, and a M.P.A. from the Lyndon Baines Johnson School of Public Affairs (1992). He received his B.S. (computer science) and B.B.A. (finance) from Loyola University in Maryland (1985).

He received his Certified Financial Planner [™] designation in 2014. The CFP[®] designation is the recognized standard of excellence for competent and ethical personal financial planning.

CFP[®] professionals are required to develop their theoretical and practical knowledge by completing a comprehensive course of study at a college or university with a curriculum approved by the CFP Board. CFP[®] professionals must pass the comprehensive CFP[®] Certification Exam, which tests their ability to apply financial planning knowledge to real-life situations.

CFP[®] professionals also must have a minimum of three years' experience in the financial planning process prior to earning the right to use the CFP[®] certification marks. This hands-on experience guarantees that CFP[®] professionals have practical financial planning knowledge, so clients can count on them to help create a realistic financial plan that fits your individual needs.

CFP[®] professionals are held to the highest of standards. CFP Board's Code of Ethics and Standards of Conduct outlines the commitment that all CFP[®] professionals make to high standards of competency and ethics. The CFP Board's Code and Standards benefits and protects the public, provides standards for delivering financial planning, and advances financial planning as a distinct and valuable profession. Compliance with the Code and Standards is a requirement of CPF[®] certification that is critical to the integrity of the CFP[®] marks. Violations of the Code and Standards may subject a CFP[®] professional to discipline. See more at: <u>https://www.cfp.net/ethics/code-of-ethics-and-standards-of-conduct</u>

He was an antitrust attorney with the Federal Trade Commission for over a decade (1998-2006 and (2008-2011) and developed and implemented policies to benefit consumers in a variety of industries including, telecommunications, electric power, and pharmaceuticals. From 2006-

2008, he was the project director for Consumer Education at Consumers Union, the non-profit publisher of Consumer Reports. He developed web-based tools to help consumers buy health insurance and to assist parents and students understand student loans and college financing. From 2011 to 2014, he directed Medicare's implementation of how to rate doctors and hospitals on the cost and quality of care furnished so that Medicare could differentiate payments based on the value of the services furnished.

He found Financial Advisor For You in 2009 as a sole proprietorship to help persons with critical financial decisions with a focus on health insurance and student loans. Financial Advisor For You, LCC was formed as an LLC in February 2014.

He is a member of the District of Columbia Bar Association and the Financial Planning Association.

Item 3 - Disciplinary Information

As of the date of this Brochure Supplement, there are no legal, regulatory or disciplinary events involving Michael S. Wroblewski.

Item 4 - Other Business Activities

Michael S. Wroblewski is not engaged in any other investment-related business activities.

Item 5 - Additional Compensation

Michael S. Wroblewski does not receive an additional compensation for providing advisory services to non-clients.

Item 6 - Supervision

FAFY is an LLC with one managing member, Michael S. Wroblewski, Managing Member, and no employees. Mr. Wroblewski developed and follows the firm's Policies and Procedures Manual. Mr. Wroblewski can be reached at (202) 257-6499.

FAFY has developed standardized analytic forms and narrative templates so that Mr. Wroblewski's client advice conforms to FAFY's practices described in this Brochure.

Item 7 - Requirements for State-Registered Advisers

Mr. Wroblewski has not been found liable in an arbitration claim, civil, self-regulatory organization, or administration proceeding. Mr. Wroblewski has not filed a bankruptcy petition.