Item 1: Cover Page

SEC Form ADV Part 2A

Marvel Financial Planning, Inc.
d/b/a
Encircle Financial Strategies

5710 Toad Hollow Lane
Indianapolis, IN 46220

Dated February 20, 2024

Telephone: 317-570-1800

This brochure provides information about the qualifications and business practices of Marvel Financial Planning, Inc. ("Adviser") doing business as Encircle Financial Strategies. If you have any questions about the contents of this brochure, please contact us by telephone at: (317) 570-1800, or by email at: kate.marvel@yourcompletecircle.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. The Adviser's registration as an Investment Adviser does not imply a certain level of skill or training.

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

Item 2: Material Changes

Marvel Financial Planning Inc. dba Encircle Financial Strategies has the following material changes to report. Material changes relate to Marvel Financial Planning Inc. dba Encircle Financial Strategies' policies, practices or conflicts of interest.

- The firm has updated its Assets Under Management. (Item 4)
- The firm offers educational workshops/seminars to its clients. (Item 5)

Item 3: Table of Contents

Item 4: Advisory Business

Firm Description

Marvel Financial Planning, Inc. ("MFP") (d/b/a Encircle Financial Strategies) ("EFS") is a corporation formed on September 17, 2001. The investment adviser is applying to be registered with the Securities and Exchange Commission ("SEC") under the Investment Advisers Act of 1940, as amended (the "Investment Advisers Act"). The principal owner of MFP is Katharine B. Marvel. The primary types of investment advisory services offered by the Adviser are investment management and financial planning.

Investment Management

Investment advisory services offered by Encircle Financial Strategies are specifically tailored to meet the needs of each client. Prior to delivering investment advisory services, the Adviser will ascertain each client's specific investment objective. Then Encircle Financial Strategies will allocate, or recommend that the client allocate, their investment assets consistent with the designated investment objective. Clients may impose reasonable restrictions on any of the Adviser's investment advisory services at any time, but restrictions must be delivered to the Adviser in writing, and must be signed by the client.

Financial Planning

Encircle Financial Strategies offers financial planning services. These financial planning services will include one or more of the following elements, customized to each client's needs: financial planning including retirement planning, cash flow, Social Security planning, tax planning, risk management, education planning and estate planning.

Encircle Financial Strategies begins with an intensive fact-finding session which helps the Adviser become familiar with the client's current financial situation (which may include, among other things, investments, income taxes, employer benefits, insurance, estate planning, family circumstances and risk tolerance and capacity.) as well as their personal goals and priorities for the next several years. Then, working from this comprehensive information, the Adviser prepares a detailed financial plan which documents the client's situation, identifies all areas which will be impacted, and makes specific goal-oriented recommendations. The Adviser's specific goal-oriented recommendations are designed to educate and allow a client to coordinate his/her financial affairs more efficiently, prudently reduce income taxes, and attempt to improve his/her overall net worth.

Once this Plan has been discussed with the client, the recommendations that the client feels comfortable with are scheduled for implementation with specific deadlines to be met. Encircle Financial Strategies continues to assist the client based on a review of services in all applicable areas of financial planning including retirement planning, cash flow, Social Security planning, tax planning, risk management, education planning and estate planning. The review schedule will be determined at each client meeting.

Please note: It is always the client's responsibility to promptly notify Encircle Financial Strategies if there is any change in their financial situation or investment objective. This notification of change allows the Adviser an opportunity to review, evaluate, or revise our previous recommendations or services.

Tailored Relationships

At the Adviser, advisory services are tailored to the specific needs of each client. Prior to providing advisory services, the Adviser will ascertain each client's investment goals and objectives. The Adviser then allocates and/or recommends that the client allocate investment assets consistent with the designated investment objective. The client may, at any time, impose reasonable restrictions on the Adviser's services, but restrictions must be delivered to the Adviser in writing, and must be signed by the client.

In performing services for the client, the Adviser is not required to verify any information it received from the client or from the client's other professionals and the Adviser is expressly authorized by the client to rely on this information. Each client is advised that it remains the client's responsibility to promptly notify the Adviser if there is ever any change in the client's financial situation or investment objectives for the purpose of reviewing, evaluating or revising the Adviser's previous recommendations or services to the client.

Managed Assets

As of December 2023, MFP managed a total of $115,319,896 in discretionary assets under management and $0 in non-discretionary assets under management.

Item 5: Fees and Compensation

Managed Discretionary Asset Fees

The Adviser bases its annual investment management fee for managed discretionary assets upon a percentage (%) of the market value of the assets and the specific types of investment management services provided. Encircle Financial Strategies charges an annual fee of up to 1.6% of assets under management. The Adviser may choose to charge a lower asset-based fee at its sole discretion.

Financial Planning Fees

An initial meeting is scheduled with a prospective client, typically at no cost or obligation. The prospective client may choose to provide financial documents such as statements from investment accounts, employer provided retirement plan accounts and tax returns for the Adviser's review prior to the meeting. During the first meeting, the Adviser and the prospective client will review the client's goals and objectives as well what the client desires from a financial planning relationship. They will also review the services offered by Encircle Financial Strategies. If the prospective client and Adviser agree that there is value in working together another meeting will be scheduled. Adviser will provide the prospective client with an estimate of the fee for the financial planning services to be provided. Prior to that meeting, the client will provide to Adviser financial documents necessary for the preparation of the plan. The financial planning fee is quoted on a project basis and covers projected time and expense associated in working with this client for a twelve-month period. This includes gathering data, developing the written plan, reviewing the plan with appropriate advisers, discussing the plan with the client, implementation, and continuing to review, monitor and update the client's affairs throughout the ensuing twelve months. While hourly fees are $250 an hour, fees are negotiable and will depend largely on the client relationship and complexity of the needs of the client.

Generally, once the client verbally agrees to the personal financial planning process, the process to develop the plan begins. Once the financial plan is completed a meeting is scheduled to discuss the plan and the specific items to be implemented with the client. Each financial plan and planning client is different, as such, the number of meetings needed to progress to the final financial plan stage will vary.

The financial planning fee is billed to the client within 180 days of the start of the relationship and can be paid by the client in any manner suitable to the client within 30 days of the invoice date. The financial planning fee shall be mutually agreed upon in advance by and between the client and Encircle Financial Strategies. Any such fee shall be separate from the asset-based investment management fee. The Adviser reserves the right to waive some of or the entire financial planning fee.

Educational Seminars/Workshops

Encircle Financial Strategies provides periodic educational seminars and workshops to clients free of charge.

Billing of Fees

Encircle Financial Strategies investment management fees shall be assessed quarterly, in advance, based on the asset values as of the day prior to the period being billed. New accounts will be assessed a prorated fee dependent upon the number of days remaining in the quarter. Encircle Financial Strategies' clients must provide their consent in advance to direct debiting of investment management fees from their custodial account. The Investment Advisory Agreement and the custodial/ clearing agreement authorize the custodian to debit the client account for the amount of the Adviser's investment management fee, and to directly remit that investment management fee to EFS in compliance with regulatory procedures. In the limited event that the Adviser bills the client directly, payment in full is expected upon presentation of the invoice.

In the event an agreement is terminated, the client will receive a prorated refund for fees paid in advance.

Other Fees

Unless clients direct otherwise or an individual client's circumstances require, the Adviser generally recommends Raymond James serve as the custodian and broker dealer for client investment accounts. Raymond James may charge transaction fees and/or commissions for effecting certain securities transactions. Raymond James may charge transactions fees and/or commissions for individual equity and fixed income securities transactions or fees may be charged for certain no-load mutual fund transactions. In addition to the Adviser's investment management fee, custodian brokerage commissions, and transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (*e.g.*, management fees and other fund expenses).

For all services offered by the Adviser, the same or different services may be offered by other firms at the same, higher, or lower fees.

Commission Transactions

The Adviser primarily recommends the purchase of no-load institutional class mutual fund securities and/or exchange traded funds for implementing investment recommendations. Encircle Financial Strategies does not actively direct clients to traditional, full service /commission brokers. Most of the Adviser's clients do not use traditional brokers. As described earlier, Encircle Financial Strategies generally recommends using the services of a centralized custodian.

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

Sharing of Capital Gains

The Adviser does not advise any client accounts that are subject to performance-based fee arrangements.

Item 7: Types of Clients

Description

The Adviser predominantly offers its services to individuals, high net worth individuals, trusts, estates, corporations or business entities.

Account Minimums

Encircle Financial Strategies generally requires an account minimum of $25,000 for investment management services.

The Adviser may reduce or waive its minimum asset requirement based upon certain factors, like anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client and other considerations. Other exceptions may apply to employees of the Adviser and their relatives, or relatives of existing clients.

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

Methods of Analysis and Investment Strategies

EFS utilizes research from a variety of sources in order to make portfolio recommendations. Research tools and sources of information that the Adviser may use include recommendations and research from unaffiliated third parties (*e.g.,* Morningstar, Nitrogen Wealth, etc.,) as well as recommendations and research from many mutual fund companies and custodians and many other reports located on the Internet using the World Wide Web.

The Adviser may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases: (investments held at least a year)
- Short Term Purchases: (investments sold within a year)

Mutual funds are typically used as the core assets in portfolios. Portfolios are diversified among stock and bond mutual funds. Within the stock category they may be further diversified among value and growth as well as large, medium and small sized investments in an effort to control the risk associated with traditional markets. Within the bond category they may be further diversified among different issuers such as government and corporate with further diversification coming from different credit qualities. Global or international funds and sector funds may be added as satellite positions. Investment strategies designed for each client are based upon specific objectives stated by the client during consultations. Clients may change their specific objectives at any time.

Please Note: Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy recommended or undertaken by the Adviser will be profitable or equal any specific performance level. Investing in securities involves risk of loss that clients should be prepared to bear.

Risks of Loss

Risk is inherent in any investment in securities and the Adviser does not guarantee any level of return on a client's investments. There is no assurance that a client's investment objectives will be achieved. A client may be subject to certain risks, including, but not limited to, the risks described below. The risks discussed below vary by investment style or strategy, and may or may not apply to a client. A client should also review the prospectuses or other disclosure documents for the securities purchased for the client's account, as they will contain important information about the risks associated with investing in such securities.

Investment strategies recommended by the Adviser may also be subject to some or all of the following types of risk:

- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They may carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many investors are interested in buying or selling a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Please Note: In light of these risks of loss and potentially enhanced volatility, clients may direct the Adviser, in writing at any time, not to employ any or all of the investment strategies recommended by Encircle Financial Strategies for their account.

Item 9: Disciplinary Information

Legal and Disciplinary

Investment Advisors are required to disclose legal or disciplinary events that are material to a client's or prospective client's evaluation of the Advisor's business or the integrity of the Advisor's management. Encircle Financial Strategies has no legal or disciplinary events to report.

Item 10: Other Financial Industry Activities and Affiliations

Other Financial Industry Activities

The Adviser is not registered as a securities broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor.

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

Code of Ethics

The Adviser maintains an investment policy for personal securities transactions at its business and it is part of the Adviser's general Code of Ethics (the "Code"). The Adviser establishes the standard of business conduct for all employees that are based on the fundamental principles of openness, integrity, honesty and trust. The Adviser also maintains and enforces written policies reasonably designed to prevent the Adviser or any person associated with Adviser from misusing material non-public information to comply with Section 204A of the Investment Advisers Act. Neither the Adviser, nor any related person of the Adviser, will recommend, buy, or sell securities within client accounts which the Adviser or a related person of the Adviser may have a material financial interest.

A copy of the Adviser's Code is available to any client or potential client upon request.

Participation or Interest in Client Transactions

The Adviser and/or its representatives may engage in securities transactions for their own accounts, including the same or related securities that are recommended to or owned by clients of the Adviser. These transactions may include trading in securities in a manner that differs from, or is inconsistent with, the advice given to clients of the Adviser, and the transactions may occur at or about the same time that such securities are recommended to or are purchased or sold for client accounts. This creates a potential for a conflict between the interest of the clients and the interests of the Adviser and/or its representatives.

Personal Trading

To address the potential for conflict of interests, the Adviser has adopted a Code that applies to its representatives who have access to non-public information relating to advisory client accounts ("Access Persons"). The Code prohibits Access Persons from using knowledge about advisory client account transactions to profit personally, directly or indirectly, by trading in his/her personal accounts. In addition, an Access Person who has discretionary authority over client accounts must generally pre-clear his/her trades or obtain prior authorization from the Adviser's Chief Compliance Officer before executing a trade. Unless an enumerated exception exists, the Code also prohibits Access Persons who have discretionary authority over client accounts from executing a security transaction for their personal accounts during a blackout period that can extend from one to seven days before or after the date that a client transaction in that same security is executed.

Item 12: Brokerage Practices

Broker-Dealer Selection

The Adviser selects broker-dealers to execute trade order for a client's account, unless the client has provided instructions to the Adviser to the contrary. As an investment adviser, the Adviser has an obligation to seek "best execution" of client trade orders. "Best execution" means that the Adviser must place client trade orders with those broker-dealers that the Adviser believes are capable of providing the best qualitative execution of client trade orders under the circumstances, taking into account the full range and quality of the services offered by the broker-dealer. When selecting a broker or dealer, the Adviser may consider the following factors: (i) client preferences, (ii) execution capability and past execution performance, (iii) access to markets, (iv) commission rates, (v) financial standing of executing firm and counterparty risk, (vi) timeliness in rendering services, (vii) availability, cost and quality of custodial services, and (vii) continuity and quality of the overall provision of services.

The Adviser may also purchase or sell debt securities through electronic trading platforms. These electronic trading platforms typically provide access to bids and offers from a greater number of dealers on a timely basis; however, these electronic platforms may impose an execution or transaction fee imbedded in the price paid or received for the security (i.e., a markup or markdown).

Research and Other Soft Dollar Benefits

Encircle Financial Strategies may receive brokerage and research services from its qualified custodian, Raymond James. Further, Encircle Financial Strategies may receive software services and technology for market research and analysis from Raymond James. These services are for the benefit of Encircle Financial Strategies in consideration of the Adviser's allocation of brokerage transactions made on behalf of clients (on both an agency and net basis) and may not directly benefit client accounts.

In addition, Adviser may receive research services from various mutual fund companies.

In addition, Adviser may attend conferences or meetings sponsored by custodians or other service providers. Where some or all of the travel expenses related to those conferences or meetings are to be paid by those custodians or service providers. This creates a potential conflict of interest in the selection by the Advisor. This is mitigated by the Firm's code of ethics third parties regarding gifts and entertainment.

Order Aggregation, Allocation and Rotation Practices

In order to seek best execution for clients, the Adviser may aggregate contemporaneous buy and sell orders for the accounts over which it has discretionary authority. This practice of bunching trades may enable the Adviser to obtain more favorable execution, including better pricing and enhanced investment opportunities, than would otherwise be available if orders were not aggregated. Bunching transactions may also assist the Adviser in potentially avoiding an adverse effect on the price of a security that could result from simultaneously placing a number of separate, successive or competing, client orders.

It is within the Adviser's sole discretion to bunch transactions and its decision is subject to its duty to seek best execution. The Adviser will aggregate a client's trade orders only when the Adviser deems it to be appropriate and in the best interests of the client and permitted by regulatory requirements.

All advisory clients participating in a bunched transaction will receive the same execution price for the security bought or sold. Average prices may be used when allocating purchases and sales to a client's accounts because such securities may be purchased and sold at different prices in a series of bunched transactions. As a result, the average price received by a client may be higher or lower than the price the client may have received had the transaction been effected for the client independently from the bunched transaction. In addition, a client's transaction costs may vary depending upon, among other things, the type of security bought or sold, and the commission or markup or markdown charged by the executing broker-dealer.

The amount of securities available in the marketplace, at a particular price at a particular time, may not satisfy the needs of all clients participating in a bunched transaction and may be insufficient to provide full allocation across all client accounts. To address this possibility, the Adviser has adopted trade allocation policies and procedures that are designed to make securities allocations to discretionary client accounts in a manner such that all such clients receive fair and equitable treatment. If a bunched transaction cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day will generally be allocated pro rata among the clients participating in the bunched transaction. Adjustments to this pro rata allocation may be made, at the discretion of the Adviser, to take into consideration account specific investment restrictions, undesirable position size, account portfolio weightings, client tax status, client cash positions and client preferences. Adjustments may also be made to avoid a nominal allocation to client accounts.

When the Adviser is not able to aggregate trades, the Adviser generally uses a trade rotation process that is designed to be fair and equitable to its clients.

Adviser does not aggregate trades. If this policy changes, this section will be updated accordingly.

Directed Brokerage

The Adviser will comply with any guidelines and/or limitations reasonably requested by a client relating to brokerage for the client's account that are contained in the client's investment management agreement. When possible, the Adviser will also observe any non-binding statement of client preferences with respect to brokerage direction.

If a client directs the Adviser to use a particular broker-dealer for execution of the client's trade orders (a "directed brokerage arrangement"), and the Adviser agrees to the arrangement, a client should understand that the Adviser may be unable to achieve best execution for the client's transactions. Any costs related to the directed brokerage arrangement are not included in the Adviser's fee, and the client is solely responsible for monitoring, evaluating and reviewing the arrangement with the directed broker-dealer and paying any commissions or markups or markdowns or other costs imposed by the directed broker-dealer.

Additionally, the Adviser generally will not aggregate the client's directed brokerage trade orders with orders for other clients of the Adviser or include such orders in its trade rotation process.

If the Adviser aggregates a client's directed brokerage trade orders with trade orders for other clients of the Adviser, the Adviser may employ the use of "step-outs" to satisfy the client's directed brokerage arrangement. A "step- out" occurs when an executing broker executes the trade and then "steps out" the trade to a clearing broker (which would be the directed broker-dealer in a directed brokerage arrangement) that confirms and settles the trade. In such a case, a client will bear the costs of any commissions, markups or markdowns imposed by the executing broker-dealer in addition to the costs of any commissions, markups or markdowns imposed by the directed broker- dealer.

If a client directs the Adviser to use a particular broker-dealer, and if the particular broker-dealer referred the client to the Adviser or if the particular broker-deal refers other clients to the Adviser in the future, the Adviser may benefit from the client's directed brokerage arrangement. Because of these potential benefits, the Adviser may have an economic interest in having the client continue the directed brokerage arrangement. The benefits that the Adviser receives may conflict with the client's interest in having the Adviser recommend that the client utilize another broker-dealer to execute some or all transactions for the client's account.

Before directing the Adviser to use a particular broker-dealer, a client should carefully consider the possible costs or disadvantages of directed brokerage arrangements.

Item 13: Review of Accounts

Periodic Reviews

The Adviser's portfolio management team generally performs account reviews at least annually with clients. All clients are contacted at least annually via email, telephone call and/or US Postal Service to schedule an appointment for a review. If the client wishes to waive that annual review, a review is prepared and either uploaded into their vault at Raymond James Client Access or is sent via email.

Review Triggers

In addition to periodic reviews, the Adviser conducts account reviews when a triggering event, like a change in client investment objectives, financial situation, market correction or client request occurs.

Regular Reports and Electronic Delivery

The Adviser generally provides written investment summary reports to clients on at least a quarterly basis. These investment summary reports contain the client account’s holdings, yield, cash flow, gains and losses, and interest earnings. The Adviser may provide additional information in the investment summary report to meet the specific reporting needs of a client as the client and the Adviser may agree.

All client correspondence, as well as all books and records of the Adviser, will be delivered and stored as electronic images and the originals of the electronically stored documents shall be destroyed. Thereafter, all electronic documents shall be deemed to serve as an original copy.

Item 14: Client Referrals and Other Compensation

Other Compensation

EFS does not receive compensation from third parties for referring clients, nor do we pay any third party for client referrals.

Client Referral

The Adviser has chosen not to use solicitors or pay referral fees. This section will be updated if the Adviser makes changes to that policy.

Item 15: Custody

Custody

Custody means holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them.

Encircle Financial Strategies does not have direct custody of any client funds and/or securities. Encircle Financial Strategies does not take physical custody of client funds and/or securities under any circumstances. Clients’ funds and securities are held by an unaffiliated qualified custodian. Please refer to Item 12 for information regarding our Brokerage Practices. Encircle Financial Strategies has implemented written policies and procedures to ensure that it will be in compliance with the required requirements and applicable safeguards with respect to custody. While Encircle Financial Strategies does not have physical custody of client funds or securities, the custodian may pay Encircle Financial Strategies management fees through a deduction from the custodial brokerage account that holds client funds. Prior to permitting direct debit of fees, each client provides written authorization permitting fees to be paid direct from the custodian. As part of the billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. The custodian does not calculate the amount of the fee to be deducted and does not verify the accuracy of Encircle Financial Strategies advisory calculation. Therefore, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact Encircle Financial Strategies directly if they believe that there may be an error in their statement.

Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian for the client accounts. The client will also receive monthly statements regarding the account directly from the broker-dealer/custodian. When you receive these statements, please review the statements carefully. Please compare asset values, holdings, and fees to the account statement issued for the previous period. At its sole discretion, Encircle Financial Strategies may send such other updates or periodic reports, as it deems appropriate, to clients.

Please Note: To the extent that Encircle Financial Strategies may provide clients with periodic account statements or reports, the client is urged to compare any statement or report provided by Encircle Financial Strategies with the account statements received from the account custodian.

Item 16: Investment Discretion

Discretionary Authority for Trading

Clients can determine to engage the Adviser to provide investment advisory services on a discretionary basis. Prior to the Adviser assuming discretionary authority over a client's account, the client is required to execute an investment management agreement with the Adviser, naming the Adviser as client's attorney and agent in fact, granting the Adviser full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

The Adviser generally accepts reasonable limitations to its discretionary authority with respect to brokerage direction and securities selection, including the designation of particular securities or types of securities that should not be purchased for the client's account, but the client may not require that particular funds or securities (or types) be purchased for the client's account. Any such limitations agreed to by a client and the Adviser are generally included as an addendum to the client's investment management agreement or in a separate letter of understanding. When possible, the Adviser will also attempt to observe any non-binding statement of client preferences with respect to factors such as brokerage direction, holding periods, and securities selection.

Item 17: Voting Client Securities

Proxy Votes

The, Adviser has chosen not to retain voting authority over its clients' proxy voting and has left the voting authority to the clients. All proxy ballots will be sent directly to a client and not the Adviser.

Any questions on these policies and procedures should be directed to kate.marvel@yourcompletecircle.com who is responsible for updating, maintaining and changing these procedures.

Item 18: Financial Information

Financial Information

The Adviser does not require or solicit prepayment of more than $1,200 in financial planning fees per client six months or more in advance and, thus, has not included a balance sheet dated not more than 90 days prior to the date of this brochure. The Adviser is not aware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments to clients, nor has it been the subject of a bankruptcy petition at any time during the past ten years.