

CFP® Disclosure of Material Conflicts of Interest

Note: Form ADV 2A, 2B and the optional Form CRS have more information about material conflicts of interest related to Mr. Richard Mark Allison and his firms, Marian Financial Services, Inc. Visit <https://marianfs.com> for a copy of these documents. This form is provided as a courtesy, in plain English form, in order to help potential or current clients understand material conflicts of interest related to Mr. Richard Mark Allison as a Certified Financial Planner®. The CFP Board of Standards has instituted a newly updated Code of Ethics and Standards of Conduct effective October 1, 2019 and fully enforced beginning July 1, 2020. This disclosure, along with Form ADV 2A, 2B, the optional Form CRS and Investment Advisory Agreements for each firm assists in complying with that updated CFP® Code of Ethics and Standards of Conduct. The CFP Code of Ethics and Standards of Conduct delineates between advice offered with and without financial planning. Therefore, this document follows that delineation.

Investment Management Services – Marian Financial Services, Inc. without Financial Planning

Marian Financial Services, Inc., hereinafter referred to as “MFS”, offers Investment Management Services for an assets-under-management fee. Investment Management Services are where we are the Portfolio Manager and/or where we outsource portfolio management to Morningstar Investment Services, Inc., hereinafter referred to as “MORNINGSTAR”, an unaffiliated Registered Investment Adviser. MFS and/or MORNINGSTAR makes the buy and sell decisions for your account and implements the trading decisions on your behalf without contacting you in advance. You grant MFS and/or MORNINGSTAR a Limited Power of Attorney (LPOA) that grants trading authority on your account. This is generally known as discretionary Investment Management Services.

MFS benefits financially if you open an account with our firm and/or MORNINGSTAR and agree to pay an assets-under-management fee. Further, if you add to your account, then we would benefit financially, because our fee is based on the total assets-under-management in your account. If you remove assets from your account, then our fee would correspondingly decline. Therefore, we have an incentive for you to maintain your current account balances and or increase your account balances. MFS is paid the full assets-under-management fee charged to your account. If we refer you to MORNINGSTAR, then we must share your fee with MORNINGSTAR. This could be construed as a conflict of interest if we recommend MFS as the Portfolio Manager since we would earn 100% of the fee. However, the fee charged by MORNINGSTAR could be higher than that charged by MFS which also could be construed as a conflict of interest. We recommend that you request a Proposal from MORNINGSTAR to compare against our MFS offering. Please refer to our web site <https://www.marianfs.com> for both MFS and MORNINGSTAR Form ADV 2A, 2B, Form CRS and other disclosures. Form CRS is optional for MFS but required for MORNINGSTAR.

Investment Management Services with Financial Planning – Marian Financial Services, Inc.

In addition to Investment Management Services for an assets-under-management fee as described above, we include Financial Planning for no additional fee. However, it is a requirement that you sign an Investment Advisory Agreement for Investment Management Services in order to obtain Financial Planning for no additional fee. In addition, you must agree to use Right Capital®, our financial planning software vendor. The same conflicts of interest that are explained above (*Investment Management Services - Marian Financial Services, Inc. without Financial Planning*) apply to this service offering as well.

Subscription Based Financial Planning

Subscription Based Financial Planning services are available through MFS *without* a requirement to open any Investment Management Services accounts. See our Investment Advisory Agreement for full details as to the services provided and fees involved.

Retirement Planning Services for Employers and their Employees

Through MFS, we offer tax-deductible fringe benefits for employers with qualified plans. This is called **Retirement Planning Services** as described in IRS Publication 15-b. This is a tax-deductible ordinary business expense to the employer with **no** W-2 or Form 5500 reporting requirements. The conflict of interest with Retirement Planning Services is *minimal to non-existent*. Employees are guaranteed not to be sold anything in writing as long as the employee is employed at the employer. The only conflict of interest exists only *after an employee retires or is terminated from the employer*. At that point, then MFS will try and establish a relationship with that ex-employee. If successful, then the ex-employee would be subject to the conflicts of interest described in this CFP® disclosure document and Form ADV 2A, 2B, and optional Form CRS for MFS.

Other License Disclosures – Insurance Agent

Richard Mark Allison is personally licensed in the States of California and Florida as an Insurance Agent. His agent number in California is 0E75011 and in Florida it is A133091. You can research his California insurance license background at <http://www.insurance.ca.gov/license-status/> and you can research his Florida insurance agent background at <https://licenseesearch.fldfs.com/Licensee/160488>. These licenses mean that Mr. Allison is licensed to sell Life Insurance, Health Insurance, and Annuities. All of these are commonly known as insurance products. You are under no obligation to purchase any insurance products from Mr. Allison in order to obtain either Investment Management Services or Subscription Based Financial Planning services with MFS. However, if you do purchase insurance products from Mr. Allison, then he may earn the standard commission for the sale of such insurance products that any other insurance agent would earn. It is theoretically impossible to say which insurance company's product is better than another insurance company's product as there are more factors to consider other than just the premium costs. (i.e., interest rates, crediting methods, guarantees, soundness and strength.) Therefore, if Mr. Allison makes a recommendation for an insurance product, he strives to do so in the client's best interest. It would constitute a conflict of interest to recommend that a client purchase an insurance product from Mr. Allison. Insurance commissions would be additional compensation paid to Mr. Allison over and above the fees charged for services from MFS.

Other License Disclosures – Real Estate Sales Associate

Richard Mark Allison is a licensed Real Estate Sales Associate with the State of Florida's Department of Business and Professional Regulation. His license number is SL 3177487. You can research his real estate license at: <https://myfloridalicense.com>. Mr. Allison is licensed for real estate in order to assist clients in making good decisions in regard to buying or selling real estate. Typically, Mr. Allison refers all clients to a more experienced and more qualified real estate brokerage firm, INI Realty Investments, Inc. However, for those referrals, Mr. Allison may earn a referral fee from the real estate transaction. You are under no obligation to allow Mr. Allison to refer you to INI Realty Investments, Inc. and you are free to use a real estate brokerage firm, sales associate or broker of your choice. If however, you allow Mr. Allison to refer you to INI Realty Investments, Inc., and Mr. Allison is paid a referral fee, then this may constitute a conflict of interest since it is compensation over and above the normal compensation he would earn from MFS.

Other Businesses – Compliance Consulting for State Registered RIA’s

Richard Mark Allison also owns RIA Rules, LLC which is a firm that assist other state registered RIA firms with compliance. This is not a conflict of interest to clients of MFS. Visit <https://riarules.com> for more details.

My EP Navigator

Richard Mark Allison has a relationship with EP Navigator. EP Navigator is a national attorney network that allows Financial Planners like Mr. Allison to refer their clients to them for legal document creation. These legal documents are Wills, Revocable Trusts, Pour-over Wills, and other related legal documents such as Certificates of Trust, Health Care Proxies, Living Wills and Durable Powers of Attorneys.

Mr. Allison is not an attorney and does not in any way, shape or form provide legal advice. All legal documents are created by a pre-screened attorney chosen by EP Navigator and licensed by the State Bar Association where the client resides. Mr. Allison does not share fees with any attorney, or EP Navigator.

Mr. Allison can earn fees for the preliminary work involved in referring clients to EP Navigator. The reason for this is that Mr. Allison helps in the data gathering process from the client, including data gathering, including client meetings and that expedites a quicker turnaround for the attorney drafting the documents. This results in the client paying lower legal fees than most local attorneys. The fees for legal document creation with EP Navigator are very reasonable. For a Will it is only \$225 per person and for a Revocable Living Trust is \$650 per person or for a joint trust for a husband and wife. These fees are significantly less than using a local attorney. However, it is up to you as the client to compare legal fees considering the addition of Mr. Allison’s fee for his time. Mr. Allison will earn a fee for his time, data gathering services and client meetings related to gathering the data for EP Navigator’s licensed attorney. This fee is based on time commitment and varies between 1 and 4 hours maximum at the rate of \$100 per hour. As an Investment Adviser Representative with MFS, Mr. Allison is licensed to charge fees for his time. You are advised to compare the cost of a local attorney against EP Navigator’s licensed attorney fee plus Mr. Allison’s fee. In almost all cases, you will find that the EP Navigator’s licensed attorney fee plus Mr. Allison’s fee added together will be significantly lower than a local attorney’s fee. In addition, having a local attorney may offer advantages over EP Navigator’s attorneys that justifies the additional legal fees. It is up to you as the client to evaluate what is best for your particular situation. As a client, you are free to choose your own local attorney rather than go through EP Navigator’s attorneys. There is no requirement to use EP Navigator’s attorneys in order to obtain services from MFS.

ACKNOWLEDGEMENT: I understand these conflicts of interests as they have been explained to me in this document and in oral discussions with Mr. Richard Mark Allison by my signature and date below. Further, I understand that other disclosures are available in the Form ADV 2A, 2B, *optional* Form CRS and Investment Advisory Agreements for Marian Financial Services, Inc., and Morningstar Investment Services, Inc. These additional disclosures are available on the web sites for MFS (www.marianfs.com). Morningstar Investment Services, Inc. disclosures are available with a Request for Proposal from MFS.

Acknowledged By:

Client Name

Richard M. Allison

_____/____/_____
Client Signature Date

_____/____/_____
Mr. Allison's Signature Date

Co-Client Name

_____/____/_____
Co-Client Signature Date