

**FORM ADV PART 2A  
DISCLOSURE BROCHURE**

**Financial Planning Fort Collins**

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This brochure provides information about the qualifications and business practices of 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.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov)

**DECEMBER 19,  
2017**

## **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 Update**

- Item 4 – Changed and clarified descriptions of Outside Investment Management Services (formerly described as Investment Advisory Services) and Financial Planning and Consulting Services. Please see Item 4 for details.
- Item 5 – Changed fee terms and payment options for Financial Planning and Consulting Services. Please see Item 5 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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### Form ADV – Part 2A – Firm Brochure

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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 18, 2017, FPFoCo reports \$21,658,238 in discretionary assets under management and \$0 in non-discretionary assets under management.

FPFoCo does not act as a custodian of client assets.

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### Investment Management Services (FPFoCo manages accounts)

We are in the business of managing 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.

We refer to these services as STRATEGY:FOCO in our marketing material and on our website.

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### Outside Investment Management Services (Outside Manager)

We also offer outside investment management services through use of third-party money managers (“Outside Manager”) for portfolio management services. We 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 will 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.

We refer to these services as INVEST:FOCO in our marketing material and on our website.

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### Financial Planning and Consulting

Finally, we are in the business of providing financial planning and consulting services. FPFoCo offers two 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)*

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.

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 this service are outlined in Item 5 of this brochure.

We refer to Open Advice package services as STRATEGY:FOCo in our marketing material and on our website.

We generally do not promote or advertise Project Advice package services in our marketing material and on our website.

## **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.

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### **Investment Management Services (FPFoCo manages accounts)**

Our standard management fee is based on the market value of the assets under management (AUM) and is calculated as follows:

**Account Value      Annual Management Fee (as a % of AUM unless otherwise noted)**

\$0 - \$249,999	1.00%
\$250,000 - \$499,999	0.90%
\$500,000 - \$999,999	0.80%
\$1,000,000 - \$1,999,999	0.65%
\$2,000,000 - \$2,999,999	0.50%
\$3,000,000 - \$3,999,999	\$15,000
\$4,000,000 - \$4,999,999	\$20,000
\$5,000,000 and above	\$25,000 + \$2,000 for each additional \$1,000,000 of AUM

The annual fees are negotiable and are pro-rated and paid in advance on a calendar quarterly basis (January, April, July, October). The management fee is a breakpoint fee and is calculated by assessing the percentage or dollar 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.

For example, an account valued at \$1,000,000 would pay a percentage fee of 0.65% or an equivalent annual dollar fee of \$6,500. The quarterly fee would be determined by the following calculation:  $(\$1,000,000 \times 0.65\%) \div 4 = \$1,625$ . An account valued at \$7,000,000 would pay a flat annual dollar fee of \$25,000 on the first whole \$5,000,000 of AUM (up to \$5,999,999) plus an additional \$4,000 for the next whole \$2,000,000 of AUM (\$2,000 for each whole \$1,000,000), resulting in a total annual dollar fee of \$29,000. The quarterly fee would be determined by the following calculation:  $\$29,000 \div 4 = \$7,250$ .

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

Assuming there are 30 or more days remaining in the calendar quarter, accounts initiated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period, as of the effective date of the agreement. In the event of a transfer of assets from another firm, the account value for billing purposes will be the value reflected on the account statement provided by the resigning firm utilized to facilitate the transfer.

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.

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**Outside Investment Management Services (Outside Manager)**

Our standard management fee is based on the market value of the assets under management (AUM) and is calculated as follows:

<b>Account Value</b>	<b>Annual Management Fee (as a % of AUM)</b>
\$1 and above	0.75%

The Outside Manager will debit the client's account for both the Outside Manager's fee, and FPFoCo's fee, and will remit FPFoCo's fee to FPFoCo. *Please note, the above fee schedule does not include the Outside Manager's fee.*

Please see the Outside Manager's Form ADV Part 2A, Item 5 for their current fee, as well as details regarding pro-ration, billing periods, billing methods, and account value aggregation.

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.

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## **Financial Planning and Consulting**

**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.

**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.

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.

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 or outside investment management services.

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

Fort Collins Tax Service, LLC provides income tax preparation and representation services to both clients and non-clients of FPFoCo and in limited cases their controlled or related entities. These services are covered under a separate engagement and agreement.

Clients of FPFoCo are eligible for discounts off of the advertised and/or customary price of income tax preparation 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.

### **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, outside investment management, and financial planning and consulting services to individuals, high net-worth individuals, banking or thrift institutions, investment companies, business development companies, pooled investment vehicles, pension and profit sharing plans, charitable organizations, corporations or other businesses, state or municipal government entities, other investment advisors, and insurance companies.

We do not have a minimum account or relationship size requirement, however we do have a minimum fee for some services.



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

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### Methods of Analysis

In developing a financial plan for a client, FPFoCo's analysis may also include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the client's specific situation.

When clients have us complete a portfolio review or any investment analysis (described in Item 4 of this brochure) as part of their financial plan, our primary methods of investment analysis are fundamental, technical, cyclical and charting analysis.

**Fundamental analysis** involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Technical analysis** involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may under perform other trading methods when fundamental factors dominate price moves within a given market.

**Cyclical analysis** is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

**Charting analysis** involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends. Charts may not accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

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## Investment Strategies

For our investment management service, 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 placed in 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.

For our outside investment management service, 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/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.

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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.

**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.

Mr. Speciner is a non-producing life, health, and variable product insurance licensee. Although Mr. Speciner remains licensed to sell insurance products, he no longer engages in the sale of insurance products for compensation, nor does he accept trailing compensation for products previously sold.

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.

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 of 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 do not receive soft dollar benefits.

- *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**

FPPoCo 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.

### **TD Ameritrade**

FPPoCo participates in the institutional advisor program offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC (“TD Ameritrade”), an unaffiliated SEC-registered broker-dealer and FINRA member. We may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between FPPoCo’s participation in the program and the investment advice it gives to its clients, although FPPoCo 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 FPPoCo
- 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
- discounts on compliance, marketing, research, technology, and practice management products or services provided to FPPoCo by third party vendors.

TD Ameritrade may also have paid for business consulting and professional services received by FPPoCo’s related persons. Some of the products and services made available by TD Ameritrade through the program may benefit FPPoCo but may not benefit its client accounts. These products or services may assist FPPoCo in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help FPPoCo manage and further develop its business enterprise.

The benefits received by FPFoCo or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, FPFoCo endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by FPFoCo or its related persons in and of itself creates a potential conflict of interest and may indirectly influence FPFoCo's choice of TD Ameritrade for custody and brokerage services.

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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 with the investment management service will be reviewed regularly on a quarterly basis by Jason Speciner, Managing Member and CCO. 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 TD Ameritrade 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 TD Ameritrade. 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 TD Ameritrade's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

### **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:

- i. FPFoCo will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
- ii. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the fee.
- iii. 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. For those client accounts where we provide outside investment management services, we maintain discretion over client accounts with respect to the securities and cash allocation, as well as the securities trading model utilized by the Outside Manager, while the Outside Manager maintains 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.

### **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.

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

**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).**

**Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities**

None to report

# **SUPERVISED PERSON BROCHURE**

FORM ADV PART 2B

Jason S. Speciner, CFP®, EA

## **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)

[Website: fpfoco.com](http://Website:fpfoco.com)

This brochure supplement provides information about Jason S. Speciner and supplements the 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.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

**DECEMBER 19,  
2017**

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

**Jason S. Speciner, CFP®, EA**

- Year of birth: 1982

### Educational Background and Business Experience

Educational Background:

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

Business Experience:

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

Investment Advisor Representative/Chief Compliance Officer .....05/2016 to Present

**Fort Collins Tax Service, LLC**

Managing Member/Tax Preparer ..... 11/2014 to Present

**Jason Speciner, Sole Proprietor**

Tax and Financial Industry Consultant..... 11/2015 to Present

**Jason Speciner, Sole Proprietor**

Notary.....06/2009 to Present

**Jason Speciner, Sole Proprietor**

Non-producing life, health, and variable insurance licensee ..... 10/2017 to Present

**Cambridge Investment Research Advisors, Inc.**

Investment Advisor Representative .....07/2013 to 10/2017

**Cambridge Investment Research Inc.**

Registered Representative .....07/2013 to 10/2017

**Jason Speciner, Sole Proprietor**

Insurance Agent .....05/2004 to 10/2017

**Long Green Planning Group, LLC**

dba for Registered Representative & Investment Advisor Representative

Manager .....08/2010 to 07/2015

**Cetera Advisor Networks LLC**

Registered Representative/Investment Advisor Representative .....07/2007 to 07/2013

**Jason S. Speciner, LLC**

dba for Registered Representative & Investment Advisor Representative

Owner .....07/2007to 12/2010

**Waddell & Reed, Inc.**

Investment Advisor Representative .....06/2004 to 07/2007

**Waddell & Reed, Inc.**

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.

**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 non-producing life, health, and variable product insurance licensee. Although Mr. Speciner remains licensed to sell insurance products, he no longer engages in the sale of insurance products for compensation, nor does he accept trailing compensation for products previously sold.

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.

**Additional Compensation**

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

**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.

**Requirements for State-Registered Advisors**

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None