



**Form ADV 2A**  
**Brochure of First Coast Planning, LLC**

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This brochure provides information about the qualifications and business practices of First Coast Planning, LLC. If you have any questions about the contents of this brochure, please contact us at (904) 460-2700 or email at [rick@firstcoastplanning.com](mailto:rick@firstcoastplanning.com). 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.

Please note that information about our investment adviser representatives *is not found* at the FINRA Broker Check site, because our investment adviser representatives are not registered representatives with a broker-dealer. Information on investment adviser representatives *is found* instead at the SEC's web site located at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Additional information about First Coast Planning, LLC also is available on the SEC's website at: <http://www.adviserinfo.sec.gov>.

Registration as a Registered Investment Adviser does not imply a certain level of skill or training. A Registered Investment Adviser refers to the firm itself, not any person.

April 11, 2019 version

## Item 2 - Material Changes for This Update

The last update prior to this one was February 13, 2019.

The reason for this update is that the President of the firm has changed his name back to his birth name, Richard Mark Allison.

*Please note that when you see the acronym "FCPLL" in this document, this is an abbreviation for our firm name First Coast Planning, LLC*

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## **Item 4 - Advisory Business**

### ***A. Information about Our Firm***

First Coast Planning, LLC started operations in August of 2004. However, First Coast Planning, LLC only became a Registered Investment Adviser, recently, in July of 2017. Therefore, it is a new firm. First Coast Planning, LLC, hereinafter referred to as "FCPLLC", is a Registered Investment Adviser with the State of Florida. FCPLLC may do business in other states as part of a *de minimus* exemption, or FCPLLC will obtain the required licensing as needed in other states when meeting the requirements of those other states.

### ***B. Types of Advisory Services Offered***

FCPLLC performs financial planning services along with the selection of other investment adviser services.

#### **Goals Based Financial Planning**

Goals Based Financial Planning is an in-depth analysis and provides answers to the question, "How can I achieve my most important goals?" It is a process whereby we work together to analyze your current financial condition and determine your most important goals. Once we assess everything, then we seek ways to solve any gaps in achieving your most important goals. We utilize a financial planning software program from Right Capital that includes account aggregation. Right Capital allows us to see your entire financial picture by linking your Bank, Credit Cards, Investment, Retirement, Mortgages, Auto Loans, Personal Loans, Stock Plans, Student Loans and most everything else in one place. Through the Right Capital portal, our clients can access their Financial Plan 24/7 and it is automatically updated as each account is updated. Right Capital is required to become a client of FCPLLC and is included as part of the Goals Based Financial Planning service.

#### **Selection of Other Advisors**

Our firm also acts as a Co-Advisor to an unaffiliated Registered Investment Adviser, Morningstar Investment Services CRD# 112525 with an SEC# 8-53593, 801-60401 whose address is 22 W. Washington St. Chicago, IL 60602-1605. We are not affiliated with Morningstar Investment Services. We rely on Morningstar Investment Services' expertise to invest client accounts and they have a diverse choice of investment portfolio options. For clients with accounts under \$100,000, we use Morningstar Investment Services as a robo-advisor which means that we do not add any Co-Advisor fee to their fee. It is optional for clients to open an account with Morningstar Investment Services. Our firm can be hired to provide ongoing financial planning advice on an annually renewable basis with or without Morningstar Investment Services. See Item 5. A. Fee Schedule for more information about our fees.

We also offer Retirement Planning Services to individuals and to businesses with 401(k) accounts as an objective second opinion service without having to move any investment or retirement accounts to our firm. See the Retirement Planning Services section below for more details.

### **C. Money Management Process and Restrictions**

See the Morningstar Investment Services disclosure documents for full details of their money management process and restrictions. Clients may not impose restrictions regarding investing or holding certain positions. Morningstar Investment Services requires that all accounts with very rare exceptions that are transferred to their firm for money management have their investment positions converted to cash to implement their Managed Portfolios, unless you invest more than \$250,000 with them at which point, they can offer customization of portfolios.

### **D. Participation in Wrap Fee Programs.**

Our firm does not participant in wrap fee programs that are managed by First Coast Planning, LLC.

### **E. Assets under Management**

The amount of discretionary assets that we manage is \$0.00. The amount of non-discretionary assets that we manage is \$0.00. The total assets under management are \$0.00. These figures are accurate as of December 31, 2018.

## **Item 5 - Fees and Compensation**

### **A. Fee Schedule**

All clients must agree to subscribe to our account aggregation and Financial Planning software vendor Right Capital in order to receive our services.

- Silver Plan – For the Silver Plan, the minimum fee charged by FCPLLC is \$1,200 as long as, the client agrees to subscribe to account aggregation via Right Capital, our Financial Planning software vendor and has at least \$25,000 to invest and opens one or more accounts with Morningstar Managed Portfolios. Morningstar’s fees are in addition to the \$1,200 fee charged by FCPLLC. With this offer, however, we **do not** add any additional fees to Morningstar’s fees. See included services appendix for more details.
- Gold Plan – For the Gold Plan, the minimum fee charged by FCPLLC is \$1,800, if the client chooses **not to open an account** with Morningstar Managed Portfolios and agrees to subscribe to account aggregation via Right Capital, our Financial Planning software vendor. See included services appendix for more details.
- Platinum Plan – For the Platinum Plan – Tier 1, the minimum fee charged by FCPLLC is \$1,500 or 0.75% per year whichever is higher. The client is charged 0.75% for an assets-under-management fee on the first \$500,000 in assets. Once the household account level exceeds \$500,001 – Tier 2, then the fee charged by FCPLLC is 0.50% per year for the assets over \$500,001. Morningstar fees are in addition to FCPLLC fees. See included services appendix for more details.

Our investment supervisory services **include** a Financial Plan and a Client Portal where clients can keep track of their financial plan 24/7. See “Fee Range Calculations” below.

**FCPLLC’s Fees for Morningstar Managed Portfolios**

Morningstar discloses their fee schedule in their Investment Services Agreement and their Form ADV 2A and related disclosure documents. Please see their disclosures for further details regarding their fee schedule. Depending on which Morningstar Managed Portfolio is chosen, the fee range is 0.30% to 0.65% annually, payable quarterly in advance. In addition, there is a 0.04% per year fee charged by Charles Schwab & Co, Inc. or Fidelity Investments for asset-based pricing which allows Morningstar to trade your Account without any per transaction (trading) commissions.

We do not charge a Co-Advisor fee for accounts invested with Morningstar under \$100,000.

Our Co-Advisor fee for accounts invested with Morningstar over \$100,000 is calculated by taking the ending value of the prior quarter and multiplying it by the fee based on assets size, then dividing that figure by four (4). In the case of a new Morningstar account, a pro-rata fee is calculated based on the number of days that the new account has remaining in the calendar quarter. For example, if a new account was opened with 30 days remaining in the calendar quarter, then a fee for those 30 days would be calculated and charged to your account.

**Fee Range Calculations**

The fee range calculations charged to a Client who opens an Account with FCPLLC and invests with Morningstar and one or more of their Managed Portfolios is as follows:

Plan Name	Asset Level	FCPLLC Fee or Co-Advisor Fee	Morningstar Fee*	Schwab or Fidelity Fee**
Silver Plan	Less than \$100,000	\$1,200 annually <u>No</u> Co-Advisor Fee	0.30 – 0.65% annually, payable quarterly	0.04% annually, payable monthly
Gold Plan***	N/A	\$1,800 annually	N/A	N/A
Tier 1 Platinum Plan	\$100,001 - \$500,000	\$1,500 or 0.75% annually, payable quarterly, whichever is higher	0.30 – 0.65% annually, payable quarterly	0.04% annually, payable monthly
Tier 2 Platinum Plan	Next \$500,001 and up	0.50% annually, payable quarterly	0.30 – 0.65% annually, payable quarterly	0.04% annually, payable monthly

\*Fee depends on Morningstar Managed Portfolio recommended.

\*\*Always refer to the latest disclosures and pricing schedules for Morningstar Investment Services and Charles Schwab & Co., Inc. or Fidelity Investments. The 0.04% fee is an asset-based pricing fee that allows Morningstar to trade commission free.

\*\*\*Gold Plan does not require any accounts to be opened with Morningstar Managed Portfolios, but does require account aggregation via Right Capital, our financial planning software vendor.

### ***Minimum Fee Explanation***

The minimum fee for a relationship with FCPLLC that **includes** a Financial Plan and Client Portal where they can access their Financial Plan 24/7 depends on which plan the client chooses. Please refer to the table above for an explanation of the minimum fees as they pertain to the different types of plans offered.

Fees and compensation for Clients referred to Morningstar Investment Services for money management are provided in more detail in their Form ADV 2A, Appendix I, Form ADV 2B and Investment Management Agreement. These documents are provided for clients upon request and prior to account opening.

### ***Retirement Planning Services (RPS) - Offer for Businesses and Employees***

Retirement Planning Services (RPS) for businesses is offered on an annual basis and the fee commitment by the business is also an annual commitment. See our Investment Advisory Agreement and related appendices for more details.

Businesses may wish to offer their employees a conflict free way of providing much needed Retirement Planning Services (RPS) to their employees without those employees being forced to move any of their investment accounts to our firm. This allows for a pure conflict-free advice offer without employees being "sold" any investment products or assets-under-management services.

This is an **employer paid, tax deductible** offering that businesses may deduct on their business tax return. See IRS Publication 15b (for use in 2019) Employer's Guide to Fringe Benefits, "Retirement Planning Services". See the table on page 6 and the explanation on page 20 in Publication 15b for more details. Consult your tax advisor for more information about the tax deductibility of this offering for your business. To comply with IRS Publication 15b, each business must offer this to all their employees in the same manner that you would offer a 401(k) to your employees. In other words, you cannot discriminate in favor of highly compensated employees. This offering is negotiable depending on the number of employees enrolled.

- Businesses - Minimum fee - \$2,400 which includes credit towards the first five (5) employee's RPS regardless of participation.
- Businesses - \$480 per employee - Includes one RPS per 12-month period.
- Businesses – Payment of RPS fees grants employees access to the Goals Based Financial Planning Services and Client Portal described above under Item 4.B.

### ***Goals Based Financial Plans - Offer for Individuals and Households***

Goals Based Financial Plans (GBFP) for individuals and households is an annually renewable offer. The Goals Based Financial Plan is updated dynamically 24/7 via the Client Portal and its account aggregation capabilities. This offering is negotiable in that it can be paid annually, semi-annually, quarterly or monthly, but the fee is firm at either \$1,200 or \$1,800 depending on the plan chosen, Silver, or Gold. The Platinum Plan includes Goals Based Financial Planning with an assets-under-management fee. See Item 4.B. for more details.



## ***B. Payment of Fees***

### ***Payment of Fees for Goals Based Financial Plans***

The fee charged for a Silver or Gold Plan is paid from an invoice and can be done via electronic funds transfer, check, debit or credit card through QuickBooks®, Square Register®, or Zoho Books® invoicing for ease of payments. If an account is opened with Morningstar Managed Portfolios (MMP), then the Co-Advisor fee for the Goals Based Financial Plan can be automatically deducted from this MMP account with the client's authorization.

### ***Payment of Co-Advisor Fees***

For Accounts placed with Morningstar Managed Portfolios, the Morningstar and Co-Advisor fees are paid quarterly in advance by deducting them from each client account.

## ***C. Client Responsibility for Third Party Fees***

Morningstar Investment Services utilizes Charles Schwab & Co. Inc. as one of their qualified custodians along with TD Ameritrade, Fidelity and Pershing. Each qualified custodian charges fees for interest on margin loans, wired funds fees, checkbook fees, insufficient funds fees and other fees disclosed in their respective pricing disclosures which is available online at their respective web sites.

There are other fees that the clients may incur that are related to the ETF's or mutual funds that are recommended or held in their Accounts. These fees are charged by the ETF or mutual fund issuer/distributor and are not shared with First Coast Planning, LLC. Please review the specific ETF or mutual fund prospectus for a detailed disclosure of all related fees.

## ***D. Termination and Fee Refunds***

The \$1,200 or \$1,800 Goals Based Financial Planning fees is an annual commitment by the Client. If the Client terminates their relationship with FCPLLC, then they will be billed for any outstanding indebtedness for the remainder of the annual fee. Clients are requested to pay this final bill promptly within 10 business days upon termination.

For Clients who open Accounts with Morningstar Investment Services, they may terminate their accounts with written notice to our home office. FCPLLC retains the right to terminate their relationship with clients with either verbal or written notice. Upon termination by either FCPLLC or the client, the effective date of termination shall be used as the ending date for valuation of the Account. The final charge for Morningstar Investment Services shall cover the period from the first day of the quarter to the termination date. Morningstar Investment Services would calculate the actual number of days remaining in the quarter. Refunds would be paid for Clients who were charged in advance for any unused days in the quarter after the termination date.

### ***E. Outside Compensation for the Sale of Securities to Clients***

Neither, FCPLLC nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

### **Item 6 - Performance Based Fees**

FCPLLC does not accept performance-based fees or other fees based on a share of capital gains or capital appreciation of the assets of a client.

### **Item 7 - Types of Clients**

FCPLLC generally provides advisory services to the following types of clients:

- Individuals
- High Net-Worth Individuals
- Trusts
- Estates
- Charitable Organizations
- Limited Liability Companies
- Client owned business entities

### ***Minimum Account Size***

FCPLLC has a minimum account size of \$25,000 to match Morningstar Investment Services' lowest account minimum. Clients referred to Morningstar Investment Services are subject to their account minimums which are \$25,000 (ETF's), \$50,000 (Mutual Funds), \$75,000 (stocks), and higher depending on the Morningstar Managed Portfolio chosen. See their Form ADV 2A, Appendix I, Form ADV 2B and their Investment Management Agreement for more information which is available prior to account opening.

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

#### **Morningstar Investment Services**

In advising clients of FCPLLC investing in the Morningstar Managed Portfolios Program, we may select from their different Managed Portfolios which include mutual funds, ETF's, and stock portfolios. These solutions are based on the information, research, asset allocation methodology and investment strategies of Morningstar Investment Services. FCPLLC relies on Morningstar Investment Services for securities analysis, investment strategies and risks.

Clients will receive separate disclosure documents from Morningstar Investment Services that more fully explains the risks involved in investing in their Managed Portfolios Program. Morningstar's disclosure documents are available on request prior to opening an account and becoming a client of FCPLLC.

## **A. Risks of Specific Securities Utilized**

Our Co-Advisor recommendations are primarily geared towards Morningstar Managed Portfolios that invest in Exchange Traded Funds or ETF's based on an underlying index. Exchange Trade Funds have unique risks specific to the ETF asset class recommended. A summary of the major risks is detailed below. These risk summaries are not all inclusive. More details about each ETF fund used can be found in the specific ETF fund's Summary Prospectuses, Full Prospectuses, Statement of Additional Information, Semi-annual and Annual Reports.

### **Equity or Stock ETF Risk Summary**

#### **Primary Risks**

(For more specific risk information, refer to the individual ETF prospectus.)

An investment in an ETF Fund could lose money over short or even long periods. You should expect an ETF Fund's share price and total return to fluctuate within a wide range, like the fluctuations of the global stock market. An Equity or Stock ETF Fund's performance could be hurt by:

- *Stock market risk*, which is the chance that stock prices overall, will decline. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices. An ETF Fund's investments in foreign stock markets can be riskier than U.S. stock investments. The prices of foreign stocks and the prices of U.S. stocks have, at times, moved in opposite directions. In addition, an ETF Fund's target index may, at times, become focused in stocks of a sector, category, or group of companies.
- *Country/regional risk*, which is the chance that world events—such as political upheaval, financial troubles, or natural disasters—will adversely affect the value of securities issued by companies in foreign countries or regions. Because an ETF Fund may invest a large portion of its assets in securities of companies located in any one country or region, an ETF Fund's performance may be hurt disproportionately by the poor performance of its investments in that area. Country/regional risk is especially high in emerging markets.
- *Emerging markets risk*, which is the chance that the stocks of companies located in emerging markets will be substantially more volatile, and substantially less liquid, than the stocks of companies located in more developed foreign markets.
- *Currency risk*, which is the chance that the value of a foreign investment, measured in U.S. dollars, will decrease because of unfavorable changes in currency exchange rates. Currency risk is especially high in emerging markets.
- *Index sampling risk*, which is the chance that the securities selected for an ETF Fund, in the aggregate, will not provide investment performance matching that of the ETF Fund's target index. Index sampling risk is also known as "tracking risk," because it fails to accurately track the performance of the index it is following as an investment strategy.

### **Fixed Income or Bond ETF Risk Summary**

#### **Primary Risks**

(For more specific risk information, refer to the individual ETF prospectus.)

Bond ETF Funds can also move up or down depending on the current strength or weakness of the overall economies of the country issuing the bonds, or the government or corporate issuer. The Bond ETF Fund's performance could be hurt by:

- *Interest rate risk*, which is the chance that bond prices overall will decline because of rising interest rates. Interest rate risk should be low for an Bond ETF Fund that invests mainly in short-term bonds, whose prices are much less sensitive to interest rate changes than are the prices of long-term bonds.
- *Income risk*, which is the chance that a Bond ETF Fund's income will decline because of falling interest rates. Income risk is generally high for short-term bond funds, so investors should expect the Fund's monthly income to fluctuate.
- *Credit risk*, which is the chance that a bond issuer will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of that bond to decline. Corporations do go bankrupt and in turn, fail to pay interest and principal. Credit risk ordinarily should be lower for Bond ETF Fund that purchases only bonds that are issued by the U.S. Treasury or are of investment-grade quality. However, it is always possible that even U.S. Treasury debt can be downgraded, thus subjecting it to interest rate risk and income risk, in addition to Credit risk.
- *Sovereign debt risk*, which is the chance that the country issuing the debt will default. Going back historically, there is a litany of countries who have defaulted on their debt in the past. Given that it has happened in the past, we must assume that it may also happen in the future. A relatively recent example of Sovereign Debt problems are the countries that make up the acronym, "PIIGS." The countries with Sovereign Debt problems that this acronym represents are Portugal, Ireland, Italy, Greece and Spain. When a country loses its credit rating or it is discovered that they are having trouble paying their debt, then the price that they must pay investors (the interest rate) goes up and the price of these bonds, go down in value. See Credit Risk above.
- *Index sampling risk*, which is the chance that the securities selected for a Bond ETF Fund, in the aggregate, will not provide investment performance matching that of the Bond ETF Fund's target index. Index sampling risk is also known as "tracking risk," because it fails to accurately track the performance of the index it is following as an investment strategy.

## Exchange Risks

Because ETF Shares are traded on an exchange, they are subject to additional risks:

- ETF Shares may be listed for trading on NYSE Arca and can be bought and sold on the secondary market (other Exchanges or Over-the-Counter) at market prices. Although it is expected that the market price of an ETF Share typically will approximate its net asset value (NAV), there may be times when the market price and the NAV vary significantly. Thus, you may pay more than NAV when you buy ETF Shares on the secondary market, and you may receive less than NAV when you sell those shares.
- Trading of ETF Shares on NYSE Arca may be halted if NYSE Arca officials deem such action appropriate, if ETF Shares are delisted from NYSE Arca, or if the activation of market wide "circuit breakers" halts stock trading generally. In fact, the SEC has implemented a new rule because of the "Flash Crash" on May 6, 2010 that has these circuit breaker requirements. The fact that this is a new rule, it is difficult to ascertain what will happen when another fast-moving market arrives. Therefore, this risk is hard to quantify, but nevertheless, we must assume this risk can negatively impact a portfolio.

## **ETF Funds are Not Guaranteed or Insured**

An investment in an ETF Fund is not a deposit of a bank and is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency.

## **Cybersecurity Risks**

FCPLLC, Morningstar Investment Services, ETF issuers, mutual fund issuers, banks and custodians are all subject to cybersecurity risks. Cybersecurity risks are those risks where the electronic information of these firms may become compromised by criminals. Unfortunately, it is not possible to be 100% secure from cybersecurity risks in today's environment. However, these types of firms, including FCPLLC do their best to ensure that cybersecurity risks are kept to an absolute minimum.

Our firm, FCPLLC, uses two factor authentication and facial identification to access sensitive client data on our electronic devices (computers, tablets, and cell phones.) In addition, we have backup systems in place that allow us to maintain backup copies of client data, if our systems were ever compromised. In addition, our Client Portal has the two-factor authentication capability which can be turned on by the client.

## **Item 9 - Disciplinary Information**

### ***A. Disciplinary Information***

There are no disciplinary events that involve our firm, First Coast Planning, LLC or our principal officer Richard Mark Allison.

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

### ***A. Registration as a Broker-dealer or Broker-dealer Representative***

FCPLLC is not affiliated with any broker-dealer nor are any of our investment adviser representatives.

### ***B. Registration Related to Commodities Trading or Advising***

Neither FCPLLC, nor its investment adviser representatives are affiliated with any commodities firm or commodities exchange.

### ***C. Registration Relationships and Possible Conflicts of Interest***

Our Principal, Richard Mark Allison is dually registered with Marian Financial Services, Inc., another Registered Investment Adviser. Marian Financial Services, Inc. is not affiliated with First Coast Planning, LLC. Clients are advised to consider which firm offers the best solution and services for their particular situation.

Charles Schwab & Co. Inc. is the custodian that we like to recommend for Morningstar Investment Services client accounts. We may be able to accommodate other custodian choices such as Fidelity

Investments through Morningstar Managed Portfolios upon request. There are also other custodian choices available through Morningstar Investment Services that we do not use, and this may constitute a conflict of interest.

### **Richard Mark Allison**

Our principal officer of First Coast Planning, LLC is Richard Mark Allison who is formerly known as Richard Allison Johnson. Richard Mark Allison is the name he was born with and he recently changed his name back to his birth name. Mr. Allison is also affiliated with another Registered Investment Adviser, Marian Financial Services, Inc. who also utilizes the services of Morningstar Investment Services. For Florida clients, you should compare services between the two firms, Marian Financial Services, Inc. and First Coast Planning, LLC to see which one is more favorable to your situation.

Mr. Allison may recommend to clients that they seek the services of a bank, a credit union, an accountant, an attorney, an insurance agency, a pension consultant or a real estate broker. Mr. Allison may have established business relationships with individuals in these institutions or business professionals. This may constitute a conflict of interest if Mr. Allison refers you to one of these financial institutions or business professionals. Comparable services may be obtained at other financial institutions or business professionals at the same or a lower cost. Clients are free to choose their own financial institution or business professional.

Richard Mark Allison is a licensed insurance agent and does his insurance business through First Coast Planning, LLC or as an individual insurance agent. When clients are asked to purchase any insurance products, then standard insurance company disclosures will be given at that time. Mr. Allison may offer insurance products where he is compensated personally or through his firm, First Coast Planning, LLC. Clients are advised to consider the fact that if you place your insurance business through Mr. Allison and First Coast Planning, LLC, then this may constitute a conflict of interest. Comparable services may be obtained from other insurance agencies or agents at the same or a lower cost. It is not a requirement for clients of First Coast Planning, LLC to purchase insurance products from Mr. Allison.

Richard Mark Allison is a licensed Real Estate Sales Associate with INI Realty Referral, Inc. If Mr. Allison asks clients to do their real estate business through his affiliated real estate brokerage firm, INI Realty Investments, Inc., then standard real estate commissions and disclosures would apply. Clients are advised to consider the fact that if you place your real estate business through Mr. Allison, then this may constitute a conflict of interest. Comparable real estate services may be obtained from more experienced real estate agents at the same or lower costs. It is not a requirement for clients of FCPLLC to use Mr. Allison as a real estate agent.

### ***D. Selection of Other Advisors***

For all clients who want to open an account with us as a Co-Advisor, we recommend a Managed Portfolio from Morningstar Investment Services. We have a relationship with Morningstar Investment Services who offers various Managed Portfolios. Our recommendation as to which Managed Portfolio best fits a client's goals is our job as a Co-Advisor. Since we are only Co-Advisors with Morningstar Investment Services and no other money management firm, then this may constitute a conflict of interest.

Full disclosure details can be found in Morningstar Investment Services' Form ADV 2A, Appendix I, Form ADV 2B and their Investment Management Agreement which is available upon request.

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

### ***A. Code of Ethics***

FCPLLC has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Personal Securities Transactions, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. You may request to see our code of ethics. For a copy of the code of the Code of Ethics, please ask your financial advisor.

### ***B. Recommendations Involving Material Financial Interests***

FCPLLC does not participate or have an interest in Client Transactions. We do not share profits or losses with clients.

### ***C. Investing Personal Money in the Same Securities as Clients***

From time to time, representatives of FCPLLC may buy or sell securities for themselves that are also held within a Morningstar Managed Portfolio. This would be nothing more than a coincidence.

### ***D. Trading Securities At/Around the Same Time as Clients' Securities***

If one of our investment adviser representatives places a trade for their own account, it is usually done without the knowledge of what Morningstar Investment Services may or may not be trading for clients at the same time.

## **Item 12 - Brokerage Practices**

### ***A. Factors Used to Select Custodians and/or Broker-dealers***

We rely on Morningstar Investment Services and their selection of a qualified custodian, but we have a personal preference of selecting Charles Schwab & Co., Inc. However, it may be possible to choose a qualified custodian other than Charles Schwab & Co., Inc. for your Morningstar Investment Services accounts. For example, if you have existing Fidelity, TD Ameritrade or Pershing accounts and do not wish to move them anywhere.

### ***Research and Other Soft-Dollar Benefits***

Morningstar Investment Services offers access to their Managed Portfolios web site for proposal requests, brochures, forms, client education handouts and client account information. This is provided to our firm, FCPLLC for utilizing Morningstar Investment Services and their Managed Portfolios. When more than 50 accounts are opened with Morningstar Investment Services, we would qualify for access to one of their research platforms without having to pay a fee.

### *Brokerage for Client Referrals*

No qualified custodian provides client referrals to our firm.

### *Directed Brokerage*

FCPLLC relies on the brokerage recommendations of Morningstar Investment Services as to which qualified custodian to use for each client, but we prefer Charles Schwab & Co., Inc. and steer our clients to Schwab.

### ***B. Aggregating (Block) Trading***

We do not do any trading of client accounts. Please see Morningstar Investment Services disclosure documents for explanations of how they allocate trades.

## **Item 13 - Review of Accounts**

### ***A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews***

Richard Mark Allison reviews client accounts. Informal reviews are conducted quarterly with formal reviews conducted annually. The Portfolio Managers of each Morningstar Managed Portfolio will make changes to client's portfolios due to market conditions at their discretion without contacting the client in advance.

### ***B. Factors That Will Trigger a Non-Periodic Review of Client Accounts***

Reviews may be triggered by material market, economic or political events, or by changes in clients' financial situations such as death, disability, retirement, termination of employment, physical move, or inheritance.

### ***C. Content and Frequency of Regular Reports Provided to Clients***

Clients will receive at least a quarterly statement of account from the custodian. If there is enough activity to warrant a monthly statement, then the custodian may also provide a monthly statement to the client. Most qualified custodians offer electronic access to statements via their web site and or email.

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

### ***A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients***

FCPLLC does not receive any economic benefits by third parties for advice rendered to our clients. However, our firm principal, Richard Mark Allison may receive certain allowances, reimbursements or services such as airline or hotel discounts, meals including refreshments and special entertainment such as city tours or musical guests for attending training events or promotional events sponsored by third party companies such as financial services companies, insurance companies, investment companies, other investment advisers or qualified custodians for attending industry events.



## ***B. Compensation Paid to Solicitors Who Refer Clients to Our Firm***

As of the date of this Form ADV 2A, FCPLLC does not currently have any Solicitor agreements with any Solicitors. In the future, FCPLLC may have Solicitor agreements with eligible attorneys and CPA's (in Florida only) that refer clients to us with accounts placed with Morningstar Investment Services and whose value is over \$500,000. In these limited circumstances, we may pay the Solicitor a portion of the client's investment management fees. A Solicitor would be defined as a client's attorney or CPA who meets the eligibility qualifications for being a Solicitor in Florida, who refers one or more clients to us with accounts over \$500,000, and where the client(s) is a Florida resident.

Any client referred to us would be charged fees according to our normal fee schedule described above in Item 5. A. No additional fees other than our normal fees would be charged to a client referred to us by a Solicitor. The exact fee that the Solicitor receives is fully disclosed in writing to each client who is referred to our firm by a Solicitor.

When a client is referred to our firm by one of these Solicitors, then the client will receive a Client Disclosure Document, Privacy Policy and our firm's Form ADV 2A Brochure & 2B Brochure Supplement and similar documents from Morningstar Investment Services, as applicable. By signing the Client Disclosure Document, you the client, are agreeing that FCPLLC may share your private financial information with these Solicitors in order for us to provide these services. More details about this arrangement can be found in the Client Disclosure Document and Privacy Policy between these Solicitors and our firm which is given to the client for their written authorization.

## **Item 15 - Custody**

### ***First Coast Planning, LLC***

FCPLLC does not hold custody of its client's accounts, nor do we accept checks or securities for deposit with a qualified custodian.

### ***Morningstar Investment Services - Managed Portfolios Program***

Morningstar uses a qualified custodian which meets the definition of a "qualified custodian." Please refer to the Morningstar Investment Services disclosure documents for more information about their selection of qualified custodians which currently are Charles Schwab, Fidelity, Pershing & TD Ameritrade.

## **Item 16 - Investment Discretion**

FCPLLC is a non-discretionary investment manager meaning that we do not make investment decisions regarding client accounts, but rather rely on Morningstar Investment Services to make all investment decisions for our clients.

## **Item 17 - Voting Client Securities**

### ***A. Proxy Voting***

FCPLLC does not vote client securities.

When we refer clients to Morningstar Investment Services, then this means that Morningstar's policies and procedures determine proxy voting. See their disclosure documents for more details about how they handle proxy voting.

### ***B. Authority***

No authority. FCPLLC does not have any authority to vote client securities for clients referred to Morningstar Investment Services.

## **Item 18 - Financial Information**

### ***A. Balance Sheet***

FCPLLC neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

### ***B. Financial Conditions Related to Custody and Discretion***

This is not applicable to FCPLLC since we do not have custody of client accounts.

### ***C. Bankruptcy Petitions in Previous Ten Years***

FCPLLC and its principal, Richard Mark Allison have never been the subject of a bankruptcy petition.

## **Item 19 - Requirements for State Registered Investment Advisers**

### ***A. Management Persons Education and Business Background***

The principal officer for FCPLLC is Richard Mark Allison also known as Richard Mark Allison. Mr. Allison is the Principal and Chief Compliance Officer for the firm. Information about Mr. Allison's Education and Business Background can be found in his Form ADV 2B brochure supplement.

### ***B. Other Business Activities of the Principal Officers and Advisers***

Information about Mr. Allison's Other Businesses can be found in his Form ADV 2B brochure supplement.

***C. Calculation of Performance Based Fees and Degree of Risk to Clients***

Our firm is not compensated for advisory services with performance-based fees, therefore there is no risk related to performance-based fee accounts since we do not offer any.

***D. Material Disciplinary Disclosures for Management Persons of this Firm***

There are no disciplinary events that involve our firm, First Coast Planning, LLC or its principal officer, Richard Mark Allison.

***E. Material Relationships that the Principals have with Issuers of Securities***

There are no material relationships that the principals have with the issuers of any securities.

## Form ADV 2B - Brochure Supplement

### Richard Mark Allison – CRD# 1813496

This brochure supplement provides information about Richard Mark Allison that supplements the First Coast Planning, LLC Form ADV Part 2A brochure. You should have received a copy of that brochure. Please contact Richard Allison Johnson if you did not receive First Coast Planning, LLC's brochure or if you have any questions about the contents of this supplement.

Please note that information about our investment adviser representatives *is not found* at the FINRA Broker Check site, because our investment adviser representatives are not registered representatives with a broker-dealer. Information on our investment adviser representatives *is found* instead at the SEC's web site located at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Additional information about Richard Mark Allison is available on the SEC's website at: <http://www.adviserinfo.sec.gov>.

Registration as an Investment Adviser Representative of a Registered Investment Adviser means that the Investment Adviser Representative has either passed a Series 65 examination, or passed both a Series 7 and Series 66, or has qualified by having one of the following professional designations: CFP®, ChFC®, PFS®, CFA® or CIC®.

*For further information about this Brochure Supplement contact:*

Richard M. Allison

Home Office

12724 Gran Bay Parkway West, Suite 410

Jacksonville, FL 32258-9486

Phone (904) 460-2700

[www.firstcoastplanning.com](http://www.firstcoastplanning.com)

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## ITEM 2 - EDUCATION & EXPERIENCE BACKGROUND

### NAME:

- Richard Mark Allison, President, Chief Compliance Officer & Investment Adviser Rep.
- Formerly known as Richard Allison Johnson
- *Born: 1956*

### EDUCATION BACKGROUND:

- University of Arkansas at Little Rock (UALR) -Bachelor of Arts in Criminal Justice - Personal Finance Minor awarded May 13<sup>th</sup>, 2017
- Attended the University of North Florida 2016-2017

### FINANCIAL DESIGNATIONS:

- Certified Financial Planner® – 1992
- Chartered Mutual Fund Counselor® – 1998
- Registered Financial Consultant® – 2004
- Chartered Advisor for Senior Living® – 2005

### BUSINESS BACKGROUND:

- Marian Financial Services, Inc. - President, CCO & Investment Adviser Rep. - 2008 - Present
- First Coast Planning LLC – Principal, CCO & Investment Adviser Rep. - 2017 – Present
  - *First Coast Planning LLC was formerly known as Rick Johnson Family Office LLC from 2004 to 2015*
- INI Realty Referral, Inc. – Real Estate Sales Associate – 2017 - Present
- INI Realty Investments, Inc. – Real Estate Sales Associate – 2013 – 2016

## A. MINIMUM QUALIFICATIONS FOR THE FINANCIAL DESIGNATIONS HELD BY MR. ALLISON

### 1. CFP® - CERTIFIED FINANCIAL PLANNER™ DESIGNATION

The CFP® is granted by the Certified Financial Planner Board of Standards.

Mr. Allison earned the CFP® License on 12/1/1992. His License number is 045467.

The requirements for obtaining and maintaining the CFP® designation is granted by the Certified Financial Planner Board of Standards. Their website is located at <http://www.cfp.net>. A synopsis of the requirements to obtain the CFP® designation is as follows:

#### A) EDUCATION REQUIREMENT

Before applying for the CFP® Certification Examination, you need to complete the education requirements set by CFP Board. You can fulfill the education requirement through one of three paths:

- 1) Complete a CFP Board-Registered Education Program
- 2) Apply for Challenge Status
- 3) Request a Transcript Review

#### B) BACHELOR'S DEGREE REQUIREMENT

A bachelor's degree (or higher), or its equivalent, in any discipline, from an accredited college or university<sup>1</sup> is required to attain CFP® certification. The bachelor's degree requirement for the CFP® certification became effective March 1, 2007. At the time Mr. Allison was granted the CFP® designation, there was not a bachelor's degree requirement in effect. However, Mr. Allison has currently earned his bachelor's degree as of May 13<sup>th</sup>, 2017. He holds a Bachelor of Arts in Criminal Justice with a Personal Finance Minor from the University of Arkansas-Little Rock.

<sup>1</sup> An "accredited college or university" is one that has been accredited by an accreditation body recognized by the U.S. Department of Education. To confirm a school's accreditation please visit the [Department of Education's Web site](http://ope.ed.gov/accreditation/Search.aspx) (ope.ed.gov/accreditation/Search.aspx).

#### C) PASS THE CFP® CERTIFICATION EXAMINATION

The CFP® Certification Examination tests your ability to apply your financial planning knowledge to client situations. The 10-hour exam is divided into three separate sessions. Because of the integrated nature of financial planning, however, each session may cover all topic areas. All questions are multiple choice, including those questions related to case problems.

At the time Mr. Allison studied for the CFP® designation, there were six individual three-hour exams that he had to pass, 18 hours total, instead of the 10-hour examination that is in effect today. In addition, each test included essay and multiple-choice questions as opposed to today where it is all

multiple-choice questions. Mr. Allison completed all six exams consecutively without fail over a two-year period and was granted the CFP® designation and license on December 1, 1992. Each course was considered 3 hours of college equivalent credit or 18 hours total.

The course curriculum that Mr. Allison took was based on these six areas of study:

- Estate Planning
- Retirement Planning
- Insurance Planning & Risk Management
- Investment Planning
- General Principles of Financial Planning
- Tax Planning

#### D) MEET THE EXPERIENCE REQUIREMENT

At least three years of qualifying full-time work experience are required for certification. Qualifying experience includes work that can be categorized into one of the six primary elements of the personal financial planning process. Experience can be gained in many ways including:

- The delivery of all, or of any portion, of the personal financial planning process to a client.
- The direct support or supervision of individuals who deliver all, or any portion, of the personal financial planning process to a client.
- Teaching all or any portion of the personal financial planning process.

Mr. Allison obtained his life insurance license in 1984 and his securities licenses in 1988. He qualified for the three years of full-time work experience prior to obtaining his certification in 1992.

#### E) PASS CANDIDATE FITNESS STANDARDS AND BACKGROUND CHECK

Applicants for CFP® certification must pass CFP Board's *Candidate Fitness Standards*, which describe conduct that will or may bar an individual from being certified. After you have met the education, examination and work experience requirements, you must disclose past or pending litigation or agency proceedings and agree to abide by CFP Board's *Code of Ethics and Professional Responsibility, Rules of Conduct* and *Financial Planning Practice Standards*. A background check will also be conducted.

Mr. Allison passed the initial background check and met the CFP Board's Candidate Fitness Standards and continues to meet these standards today. Mr. Allison will gladly have his fingerprints taken and submit them to the FBI and then have the results mailed to any client who requests them.



## F) PAY CERTIFICATION FEES

Upon successfully completing the first three steps, fees will apply as follows:

- A one-time, non-refundable initial certification application fee of \$100 for the background checks as noted above.
- A biennial certification fee of \$360.
- Mr. Allison has paid the required fees to maintain his CFP® certification continuously since it was first granted on December 1, 1992.



## G) AUTHORIZATION TO USE THE CFP®, CERTIFIED FINANCIAL PLANNER™ AND MARKS.

Mr. Allison received his authorization to use the CFP® Designation and mark on December 1, 1992. To maintain the CFP® designation, Mr. Allison must complete 30 hours of Continuing Education in the field of Financial Planning every two years. Mr. Allison has continuously complied with the 30 hours of Continuing Education requirement each reporting period since he first earned the right to use the CFP® mark.

Verification that Mr. Allison does indeed hold the CFP® Designation as claimed in this document can be obtained by visiting the Certified Financial Planner Board of Standards web site at [www.cfp.net](http://www.cfp.net) or by calling 800-487-1497.

## 2. CASL® - CHARTERED ADVISOR FOR SENIOR LIVING®

The CASL® is granted by The American College of Financial Services, Bryn Mawr, Pennsylvania.

Mr. Allison was granted the CASL® designation on August 1, 2005.

A CASL® (Chartered Advisor for Senior Living™) is a financial services professional who is uniquely qualified to work with mature clients and those planning for retirement. A CASL® has the specific knowledge and experience to enhance the quality of your later years by assisting you with important investment, health insurance, retirement and estate planning decisions. A CASL® can provide guidance and assistance on a broad range of financial and senior lifestyle topics including:

- Saving for retirement
- Structuring distributions from pensions, 401(k)s, 403(b)s, IRAs, and Social Security
- Planning for health and long-term care needs
- Developing effective estate planning strategies

#### A) EXPERIENCE

The experience requirement for the CASL<sup>®</sup> designation may be satisfied by EITHER of the following:

- Achieving the experience requirements for The College's CLU<sup>®</sup>, ChFC<sup>®</sup>, RHU<sup>®</sup>, REBC<sup>®</sup>, and CLF<sup>®</sup> designations, OR
- Advising clients on financial and/or practical matters relating to their retirement years or on issues dealing with aging for at least three of the five years preceding the awarding of the designation. The same rules for part-time qualifying experience count for this type of work experience as count toward the CLU<sup>®</sup> and ChFC<sup>®</sup> designations.

#### B) CODE OF ETHICS

Each designee will be required to adhere to The American College's Code of Ethics and Procedures. Embodied in the Code are the Professional Pledge and the eight Canons.

#### C) CONTINUING EDUCATION

Each designee must complete 15 hours of continuing education every two years with the additional condition that at least 10 of these hours should be in course work directly related to the course work required to obtain this designation. The CE requirements for the CASL<sup>®</sup> designation are administered by the PACE Recertification Program.

The CASL<sup>®</sup> designation has five required courses which are:

- HS 328 Investments
- HS 330 Fundamentals of Estate Planning
- HS 350 Understanding the Older Client
- HS 351 Health and Long-Term Care Financing for Seniors
- HS 352 Financial Decisions for Retirement

Each CASL course is considered 3 hours of college equivalent credit or 15 hours total.

### 3. RFC<sup>®</sup> - REGISTERED FINANCIAL CONSULTANT<sup>®</sup> DESIGNATION

The RFC<sup>®</sup> is granted by the International Association of Registered Financial Consultants.

Mr. Allison was granted the RFC<sup>®</sup> Designation on October 1, 2004.

The International Association of Registered Financial Consultants (IARFC) is a nonprofit professional credential organization of proven financial professionals formed to foster public confidence in the financial planning profession to help financial advisors exchange planning

techniques, and to give deserved recognition to those practitioners who are truly committed to ethical standards and continuous professional education.

Because there are no consistent licensing requirements for the various persons who call themselves financial planners the public has a critical need for a method of distinguishing the qualified and dedicated financial advisor.

The IARFC provides the public with a convenient access to a pool of well-qualified practitioners from which to choose a financial advisor. It is the only professional organization that requires all its members to meet and document seven stringent requirements, of education, experience, examination, integrity, licensing, ethics and a significant amount of professional education.

## 1. REQUIREMENTS FOR THE RFC® DESIGNATION

### A) EXPERIENCE.

Applicant must have a minimum of four years of experience as a full-time practitioner or educator in the field of financial planning or financial services.

### B) EDUCATION.

Applicant must have earned a baccalaureate or graduate degree in financial planning services with strong emphasis in subjects relating to economic, accounting, business, statistics, finance, and similar studies; or have earned one of the following professional degrees or designation: AAMS, CFA, CFP®, ChFC, CLU, CPA, EA, JD, or completed a CFP® equivalent or IARFC approved curriculum at an accredited college or university. The new Financial Planning Process™ course curriculum qualifies.

Mr. Allison qualified for this Education provision by already having attained the CFP® Designation, but also has a baccalaureate degree as of May 13<sup>th</sup>, 2017.

### C) EXAMINATION.

The educational curriculum must have included a written examination process. If not, an experienced candidate must pass an RFC challenge examination.

### D) LICENSING.

Applicant must have met local licensing requirements for all products offered, such as securities, life and health insurance; or an applicant who is a fee-only planner or trust officer and is not licensed must submit information on the applicant's RIA or an RIA affiliation or business conduct procedures.

E) INTEGRITY.

Applicant must have a clean record of personal and business integrity with no suspensions or revocation of any professional licenses.

F) ETHICS.

Applicant must subscribe and continually adhere to the RFC Code of Ethics.

G) CONTINUING EDUCATION.

All members must conduct a minimum of 40 hours per year of Professional Continuing Education in the field of personal finance and professional practice management.

H) ETHICS CE.

Must complete an IARFC approved CE course or curriculum on operational ethics and standards of conduct consisting of two units every two years.

I) COMPLIANCE.

Annually the RFC® must provide assurance of continued compliance and operation.

J) PLAN WRITING CAPACITY.

The member must provide evidence that the member can produce a high-quality personal financial plan. (Effective 2009) The Financial Planning Process™ includes this component, but the applicant may use any planning structure or software.

#### 4. CMFC® - CHARTERED MUTUAL FUND COUNSELOR® DESIGNATION

The CMFC® is granted by the College for Financial Planning.

Mr. Allison was granted the CMFC® Designation on March 2, 1998.

The CMFC Program is the only industry-recognized mutual fund designation. It is the result of collaboration between the College for Financial Planning® and the Investment Company Institute (ICI), the primary trade association for the mutual fund industry. The program's quality and thoroughness reflect the combined experience and expertise of the College and the ICI.

This program provides you with a thorough knowledge of mutual funds and their various uses as investment vehicles. As a graduate of the program, you can approach mutual funds with a new understanding and confidence, as well as having the ability to communicate that confidence to your clients.

#### A) REQUIREMENTS

The College for Financial Planning® awards the CHARTERED MUTUAL FUND COUNSELOR<sup>SM</sup> AND CMFC® designation to students who successfully complete the program must;

- Pass the final examination; and
- Comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.
- Students must sign and return the Code of Ethics forms within six months of passing the final exam. Failure to complete and submit the forms within this time frame may result in termination of the individual's candidacy. If an individual wishes to apply for authorization to use the Marks in the future, he or she may be required to fulfill the initial designation requirements in place at the time of passing the exam.

Successful students receive a certificate and are granted the right to use the designation on correspondence and business cards for a two-year period.

#### B) CONTINUED USE

Continued use of the CMFC® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the CMFC® designation by:

- Completing 16 hours of continuing education;
- Reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct; and
- Paying a biennial renewal fee of \$75.

#### C) CHARTERED MUTUAL FUND COUNSELOR® COURSE CURRICULUM:

- Introduction to Mutual Funds
- Open & Closed End Funds: Types & Characteristics
- Other Packaged Investment Products
- Risk/Return: Part I
- Risk/Return: Part II
- Asset Allocation
- Selecting a Mutual Fund for a Client

- Retirement Planning
- Ethics, Integrity & Professional Conduct

### ITEM 3 - DISCIPLINARY INFORMATION

Mr. Allison has a clean insurance, securities and investment adviser background history and therefore he has no disciplinary information on his record pertaining to any licenses and or designations that he has held in the past or currently holds today in Florida or any other state.

Additional information about Richard Allison Johnson is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### ITEM 4 - OTHER BUSINESS ACTIVITIES

Richard A. Johnson also owns 100% of Marian Financial Services, Inc. which is a registered investment adviser licensed in IN, FL, KY and TX. His web site is located at: [www.marianfs.com](http://www.marianfs.com).

Mr. Allison spends about 10 - 20% of his time working for First Coast Planning LLC and about 80 - 90% of his time working for Marian Financial Services, Inc. First Coast Planning LLC was formerly known as Rick Johnson Family Office LLC from August of 2004 until March of 2015. First Coast Planning, LLC is not affiliated with Marian Financial Services, Inc. although both are 100% owned by Mr. Allison.



Richard A. Johnson is a real estate sales associate licensed with INI Realty Referral, Inc. located at 3603 Cardinal Point Dr., Jacksonville, FL 32257. Their web site is located at <http://www.inirealtyinvestments.com>. INI Realty Referral, Inc. has no affiliation with Marian Financial Services, Inc. or First Coast Planning, LLC.

From time to time, Mr. Allison runs across clients and prospects who may be selling their real estate or looking to buy real estate, including businesses. Mr. Allison seeks to assist anyone who needs help with these activities. He will earn a split of the standard real estate commission for this activity. Mr. Allison spends less than 5% of his time in this activity.

### ITEM 5 - ADDITIONAL COMPENSATION

#### 1. COMPLIANCE RELATED

Mr. Allison may receive fees for consulting on RIA compliance matters from other Investment Adviser Representatives and their RIA firms. This does not constitute any conflicts of interest towards our investment adviser clients but is a source of additional compensation.

## 2. REAL ESTATE RELATED

Mr. Allison's outside business activities described under Item 4 above may constitute an incentive to recommend himself to be hired by the client as a real estate agent. This may constitute a conflict of interest to clients. Clients are advised to consider whether hiring Mr. Allison as a real estate agent is in their best interests.

## 3. INSURANCE PRODUCTS RELATED

Mr. Allison may receive commissions from the sale of insurance product related transactions for which he is licensed. This may constitute a conflict of interest to clients. Clients are advised to consider whether hiring Mr. Allison as an insurance agent is in their best interests.

## 4. SOLICITOR FEES RELATED

FCPLLC may have Solicitor agreements with eligible attorneys and CPA's (in Florida only) that refer clients to Mr. Allison and where the Solicitor is paid a portion of the client's investment management fees. A Solicitor would be defined as a client's attorney or CPA who meets the eligibility qualifications for being a Solicitor in Florida, who refers one or more clients to us, and where the client(s) is a Florida resident. This is considered a source of additional compensation.

Any client referred to Mr. Allison would be charged fees according to our fee schedule described in our Form ADV 2A. No additional fees other than these fees would be charged to a client referred to Mr. Allison by a Solicitor. The exact fee that the Solicitor receives is fully disclosed in writing to each client who is referred to Mr. Allison by a Solicitor.

When a client is referred to Mr. Allison by one of these Solicitors, then the client will receive a Client Disclosure Document, Privacy Policy and our firm's Form ADV 2A Brochure & and Mr. Allison's Form ADV 2B Brochure Supplement and similar documents from Morningstar Investment Services, Inc., as applicable. By signing the Client Disclosure Document, you the client, are agreeing that MFS and Mr. Allison may share your private financial information with these Solicitors for us to provide the investment management services that we offer. We do not believe that there is any conflict of interest by your attorney or CPA referring you to Mr. Allison, since there is not any difference in the total fee charged to clients of Solicitors, or clients not referred by a Solicitor. More details about this Solicitor arrangement can be found in the Client Disclosure Document and Privacy Policy between these Solicitors and our firm which is given to the client for their written authorization.

## 5. DUAL REGISTRATION

Mr. Allison is dual registered as an investment adviser representative with Marian Financial Services, Inc. and First Coast Planning, LLC. Florida clients are asked to consider which firm, either

Marian Financial Services, Inc. or First Coast Planning, LLC offers the best mix of fees and services for their situation. Further information regarding Marian Financial Services, Inc. can be found by visiting their web site at: [www.marianfs.com](http://www.marianfs.com). These two firms are not affiliated, but both are 100% owned by Mr. Allison.

## ITEM 6 - SUPERVISION

Mr. Allison is a 100% owner of First Coast Planning, LLC and is self-supervised.

## ITEM 7 - ADDITIONAL DISCLOSURE REQUIREMENTS FOR STATE-REGISTERED ADVISERS

### A. DISCIPLINARY INFORMATION

See Item 3 above.

### B. BANKRUPTCY INFORMATION

Mr. Allison has never declared bankruptcy.





## Our Privacy Policy

First Coast Planning, LLC (hereinafter referred to as "FCPLLC") is committed to safeguarding your confidential information.

We hold all non-public personal information provided to our firm in the strictest confidence. We know that you expect us to conduct and process the services for which you have engaged us in an accurate and efficient manner. To do so, we must collect and maintain certain non-public personal information about you. For instance, depending on the services that you request, we may obtain information, such as your name, address, tax identification number, birth date, assets and income, beneficiary information and possibly your personal bank account information and/or health status.

Transactional information is collected from activity in your account(s), such as investment and insurance history and balances. This category includes your communications to us concerning your investments and accounts.

Information may be shared with unaffiliated parties in instances where you have granted us authority to handle your account(s), such as investment companies, insurance companies, insurance marketing companies, real estate firms, mortgage firms or outside brokerage firms.

As permitted by law, your non-public personal information may be disclosed to regulatory agencies or government personnel acting in an official capacity. At your direction and only to the extent necessary, we may release non-public personal information to other professionals for purposes of estate or insurance planning, tax preparation or other financial areas of expertise. These other professionals that we may share information with may include mortgage brokers, attorneys and accountants upon verbal eligible employee requests to do so, in order to help facilitate the requested additional services that they provide. In order to provide an overall satisfactory eligible employee experience, FCPLLC will share confidential eligible employee information in order to provide its financial planning services to its eligible employees. This sharing of information is acknowledged in the Investment Advisory Agreement between FCPLLC and the eligible employee(s).

If an eligible employee(s) is referred to FCPLLC by a Solicitor (Attorney, Agent or Advisor), then we will share confidential eligible employee information with that Solicitor in order to provide our retirement planning services. This sharing of information is acknowledged in an Eligible Employee Disclosure Document provided to the eligible employee along with a copy of our Form ADV 2A and 2B's. Some of the firms that we share information with are:

- Charles Schwab & Co. Inc. and its affiliates
- Other Registered Investment Advisors
  - (Solicitor Firms & their Staff Personnel)
- Other Investment Advisor Representatives
  - (or Solicitors)
- Attorneys who act as Solicitors
  - (in Florida only)
- CPA's who act as Solicitors
  - (in Florida only)

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First Coast Planning, LLC  
Attn: Rick Johnson  
109 Velvetleaf Drive  
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