



Portland Financial Planning Group, LLC

511 Congress St., Suite 804

Portland, ME 04101

(207) 771-8821

www.pfpg.com

Form ADV, Part 2A 3/31/2020

This Brochure provides information about the qualifications and business practices of Portland Financial Planning Group, LLC (a.k.a. PFPG). If you have any questions about the contents of this Brochure, please contact us at (207) 771-8821 or info@pfpg.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.

Portland Financial Planning Group, LLC is a state-licensed investment advisor. Licensing of an investment advisor does not imply any level of skill or training.

Additional information about Portland Financial Planning Group, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2: Material Changes

Since the last annual update on March 18, 2019, there has been one material change. Thomas S. Rogers has resigned from his position as Principal effective September 30, 2019. Brian L. Dietz is now the sole principal and owner of PFPG. See **Item 4 – Advisory Business**. In addition, although not material, this Brochure has been amended at Item 4 to revise disclosures regarding the asset types used in the management of client accounts, and Item 5 has been revised to update PFPG’s hourly fees for one-time project-based services.

If you have any questions about the information in this Brochure, please contact us. Copies of this Brochure may be obtained by contacting Debra Yoo, Director of Client Services at (207) 771-8821 or info@pfpfg.com. Our Brochure is also available on our web site, www.pfpfg.com, in PDF format.

Information about Portland Financial Planning Group, LLC and its state-licensed investment advisor representative is also available via the SEC’s web site www.adviserinfo.sec.gov.

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Item 4 – Advisory Business

OUR FIRM'S HISTORY

In 1998, Brian Dietz co-founded Portland Financial Planning Group, LLC to provide fee-only, comprehensive financial planning and investment advisory services to clients seeking objective advice about their personal finances. We have one principal, Brian, plus one full-time staff member who coordinates client services in addition to managing systems and operations and administering the office. PFPG is a *fee-only* firm, which means that we sell no products and receive no commissions. We recommend investments and make professional referrals based solely on the best interest of our clients.

OUR OWNER

Brian Dietz is the sole owner of PFPG. He is responsible for the major decisions of the firm, both administratively and in advising clients.

SERVICES OFFERED

PFPG provides clients with advisory relationships structured on a retainer fee basis, and occasionally one-time project consultations billed on an hourly or fixed-fee basis. Each service is described further below.

In general, we tailor our advisory services to meet the needs and desires of each client. Similarly, we design each client's portfolio individually based on model portfolio allocations developed by PFPG. Clients may impose reasonable limitations on the parameters of PFPG's advice if they so desire.

We primarily recommend no-load mutual funds and other low-cost investment vehicles. For some clients, we recommend individual municipal bonds and other fixed income securities. We may also recommend immediate or deferred annuities. For investments held by clients in their 401(k), 403(b) or other qualified retirement plan accounts, advice about such accounts is limited by each plan's menu of available investment options.

In performing its services, PFPG relies exclusively upon information received from you and/or other professionals with whom you work. If you request it, we may recommend the services

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of other professionals for implementation purposes. You are under no obligation to engage the services of any such professionals. We offer both discretionary and non-discretionary advisory services. For clients who grant us discretionary authority, PFPG will manage your account in accordance with your designated investment objectives and any relevant limitations. In non-discretionary engagements, you retain absolute discretion over investment recommendations and their implementation, and you are free to accept or reject any recommendation from us. Moreover, you are responsible for promptly notifying PFPG of material changes in your financial situation or investment objectives so that we can reassess our advice to you.

INVESTMENT AND FINANCIAL PLANNING ADVICE ON RETAINER

Typically PFPG provides combined comprehensive financial planning and discretionary or non-discretionary investment advisory services on an annual fixed-fee basis. (In a few cases, PFPG offers either one or the other service on an annual fixed-fee basis.) “Non-discretionary” means that the client is directly involved in all investment decisions and approves each purchase and sale, unlike discretionary services, which do not require prior client approval for trades. When engaging PFPG for investment advisory and financial planning services, you will sign a formal *Investment Advisory and Financial Planning Agreement* that details the terms under which your assets are managed. Please see Item 5 for specific information on fees.

PFPG primarily recommends that clients allocate their assets among various mutual funds, exchange-traded funds, and individual government bonds in accordance with the client’s investment objectives. We develop an initial investment plan based on your existing portfolio followed by periodic reviews, usually on a quarterly or semi-annual basis, but also when there is an extraordinary economic/market event or substantial change in your personal affairs. Generally we assist you in prioritizing your needs regarding financial planning, estate planning, tax planning, and risk management planning services. We then address your priorities over the course of the engagement.

ONE-TIME PROJECT SERVICES

On occasion, PFPG provides a range of financial planning and/or consulting services on a project basis (including, but not limited to, goal setting, net worth calculation, cash flow projections, retirement analysis, portfolio risk assessment, asset allocation, investment policy statement, portfolio review and recommendations, insurance analysis, income tax analysis, education funding and estate planning). When engaging PFPG for such consultations, clients

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enter into a formal *Financial Planning and Consulting Agreement* that spells out the parameters of PFPG's advice. Fees are discussed in Item 5.

AMOUNT OF ASSETS UNDER MANAGEMENT

As of December 31, 2019, PFPG provided investment advice on approximately \$58,037,752 million of assets under management, of which \$2,919,662 (8 accounts) were discretionary managed assets and \$55,118,090 million (151 accounts) were non-discretionary managed assets.

WRAP-FEE PROGRAMS

PFPG does not participate in so-called wrap-fee programs. Such programs commonly bundle investment advice and brokerage services into a single fee, generally based on the size of the portfolio.

CONFIDENTIALITY

All client information, whether personal or financial, is held in the strictest confidence.

Item 5 – Fees and Compensation

As a fee-only advisory firm, we receive no compensation for the sales of securities and other financial products. We adhere to a Fiduciary Oath that requires us to act in your best interests at all times.

We provide advisory services on an annual fixed fee (retainer) basis. The annual fixed fee is negotiable, but generally ranges from \$6,500 to \$25,000, depending upon numerous subjective and objective factors, including but not limited to: net worth; the amount of assets to be managed; portfolio composition; the professional(s) rendering the services; the scope and complexity of the engagement; and prior relationships with PFPG and/or its representatives. The fee is subject to revision on an annual basis, and if the scope and complexity of the services, or your financial profile, change significantly over the course of the year. A rough estimate of the first-year fee is 0.65% on the first million of net worth, 0.40% on the next \$3 million, and 0.225% thereafter. If your net worth is \$1 million, your estimated

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annual fee would be \$6,500. If it is \$2.5 million, your estimated annual fee would be \$12,500. PFPG's minimum annual fixed fee for new clients is \$6,500. PFPG, in its sole discretion, may decrease or waive its minimum annual fee. **Please Note:** If a client is subject to PFPG's minimum annual fee of \$6,500 and maintains a net worth of less than \$1,000,000, that client's annual fee will exceed the 0.65% noted above.

The terms and conditions of the engagement are described in the *Investment Advisory and Financial Planning Agreement* between you and PFPG. You will receive an invoice for the fee quarterly in advance, payable on receipt. With your written authorization, PFPG may have the client's qualified custodian debit your account(s) for the amount of the fee and directly remit that fee to us.

If you decide to terminate PFPG's services during any billing quarter, we will prorate your fee through the date of termination.

In some circumstances it may be appropriate to work with you on a one-time (project) basis. PFPG will charge a fee (fixed and/or hourly) for these services. PFPG's financial planning fees are negotiable, but generally range from \$500 to \$5,000 on a fixed fee basis or \$250 per hour on an hourly rate basis, depending upon the level and scope of the services required. You will be provided with an estimate. Before engaging PFPG to provide financial planning and/or consulting services, you will be required to enter into a *Financial Planning and Consulting Agreement* with PFPG describing the terms and conditions of the engagement, the scope of the services to be provided, and the portion of the fee that is due from you before we begin.

You may also incur transaction fees and other charges imposed by custodians, brokers, or third party investment managers. Mutual funds, exchange traded funds (ETFs), and annuities also charge internal management fees, which are described in their fund's prospectuses. Such charges, fees and commissions are exclusive of and in addition to PFPG's fee. PFPG does not receive any portion of these commissions, fees, or costs.

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

This item is not applicable. PFPG does not levy performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) or practice side-by-side management (manage hedge funds "side by side" with mutual funds).

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Item 7 – Types of Clients

We provide our services primarily to individuals and families, including high net worth individuals. Our clients include trusts, estates, and not-for-profit organizations.

PFPG has no account minimums. However, there is a minimum annual fee described in Item 5.

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

INVESTMENT STRATEGIES AND METHODS OF ANALYSIS

In designing investment plans for clients, PFPG relies upon the information supplied by the client and the client's other professional advisors. This includes information about the client's financial situation, estate planning, tax planning, risk management planning, short-term and long-term lifetime financial goals and objectives, investment time horizon, and perceived tolerance for risk.

You and your PFPG advisor agree on an investment policy which sets forth a recommended strategic asset allocation. Your PFPG advisor recommends specific no-load (no commission) mutual funds and other investment products and securities. We periodically monitor your investment portfolio and suggest changes when appropriate. To maintain asset class weights within range of their strategic targets, we will make suggestions for rebalancing your assets subject to tax and other constraints.

PFPG's investment philosophy centers on *cost control* and *predictability of outcomes*. As a result, index funds form the core of most portfolios we manage. We emphasize asset allocation rather than individual security selection. According to a substantial body of research, disciplined portfolio rebalancing to a set asset mix is one of the best and most reliable contributors to investment return in the long run.

Our asset allocations are long-term in nature; we don't make frequent changes to the asset mix for most portfolios. However, we monitor market trends and economic developments (e.g., interest rates, inflation, asset class valuations) and make strategic and/or tactical adjustments when there is reasonable evidence to support it.

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TYPES OF INVESTMENTS

The equity asset classes to which we usually allocate some degree of portfolio exposure include: large, mid, and small cap domestic stock; foreign stock, including emerging markets and small caps. Fixed-income segments include exposure to government and corporate bonds – usually of short and intermediate maturities.

Recommended investments usually consist of no-load stock and bond mutual funds – along with exchange-traded funds. We may also recommend alternative investments (such as absolute return, real estate, and commodities funds). Some investment portfolios may also include individual fixed income investments (such as CDs, US Treasury bonds, and municipal/state bonds). In some cases, client portfolios may include individual stocks, but these are generally part of a client's holdings prior to engaging PFPG.

SOURCES OF INVESTMENT INFORMATION AND ANALYSIS

We use so-called fundamental research about investments rather than technical analysis. The main sources of information include commercially available investment information and evaluation services, financial newspapers and journals, webinars, academic white papers, and periodicals. We also consult fund prospectuses and statements of additional information. We make extensive use of data aggregation services and software such as Morningstar Advisor and Value Line. Brian also attends regional and/or national professional investment and financial planning conferences.

RISK OF LOSS

Investing in securities of any kind involves a risk of loss that clients should be prepared to bear. Our investment recommendations seek to limit that risk through broad global diversification in equities (through broadly diversified stock mutual funds) and investments in diversified bond funds. However, the investment methodology will still subject the client to declines in the value of their portfolios, which can at times be dramatic. Investments are subject to various market, currency, economic, political, and business risks.

CASH BALANCES IN CLIENT ACCOUNTS

Cash in your investment accounts is typically swept into a bank or money market mutual fund account offered by the custodial institution (such as TD Ameritrade). PFPG maintains cash

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balances as directed by you, primarily to meet your cash flow needs and to provide a safe hedge to the rest of your portfolio. Cash balances are also maintained when clients wish to pay PFPG's advisory fees by direct deduction from their investment accounts.

Item 9 – Disciplinary Information

As a licensed investment advisor, PFPG must disclose all material facts about any legal or disciplinary events that could affect your decision to engage our services. PFPG has had no legal or disciplinary events.

Item 10 – Other Financial Industry Activities and Affiliations

PFPG has no activities or affiliations that apply to this item.

Item 11 – Code of Ethics

PFPG adheres to the Certified Financial Planner® Board of Standards Code of Ethics and Standards of Conduct. A CFP® professional must:

Act with honesty, integrity, competence, and diligence.

Act in the client's best interests.

Exercise due care.

Avoid or disclose and manage conflicts of interest.

Maintain the confidentiality and protect the privacy of client information.

Act in a manner that reflects positively on the financial planning profession and CFP® certification.

We will provide you with a full copy of the Code of Ethics and Standards of Conduct upon request.

In addition, PFPG also adheres to the NAPFA (National Association of Personal Financial Advisors) Fiduciary Oath. To read the Oath, please see Item 19 of this brochure.

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INVESTMENT POLICY

As PFPG's advisory representative, Brian may not effect for himself or for his immediate family any transactions in a security which is being actively purchased or sold, or is being considered for purchase or sale, on behalf of any of PFPG's clients, unless in accordance with the following Firm Procedures.

FIRM PROCEDURES

In order to implement PFPG's investment policy, the following procedures have been put into place:

- 1.) If PFPG is purchasing or considering for purchase any security on behalf of PFPG 's client, Brian may not transact in that security prior to the client purchase having been completed by PFPG, or until a decision has been made not to purchase the security on behalf of the client; and
- 2.) If PFPG is selling or considering the sale of any security on behalf of PFPG's client, Brian may not transact in that security prior to the sale on behalf of the client having been completed by PFPG, or until a decision has been made not to sell the security on behalf of the client.

EXCEPTIONS

- 1.) This investment policy has been established recognizing that some securities being considered for purchase and sale on behalf of PFPG 's clients trade in sufficiently broad markets to permit transactions to be completed without any appreciable impact on the markets of the securities. Exceptions may be made to the policies stated above under certain circumstances. Records of these trades, including the reasons for the exceptions, will be maintained with PFPG's records in the manner set forth above.
- 2.) Open-end mutual funds and/or the investment subdivisions which may comprise a variable insurance product are purchased or redeemed at a fixed net asset value price per share specific to the date of purchase or redemption. As such, transactions in mutual funds and/or variable insurance products by Brian are not likely to have an impact on the prices of the fund shares in which clients invest, and are therefore not prohibited by PFPG's Investment Policy and Procedures.

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In accordance with applicable federal and state securities laws, PFPG also maintains and enforces written policies reasonably designed to prevent insider trading by PFPG or any person associated with PFPG. Brian is PFPG's chief compliance officer.

CONFLICTS OF INTEREST

PFPG believes that its business methodologies, ethics rules, and adopted policies minimize potential conflicts of interest, and any conflicts of interest that may remain. You should be aware that no set of rules can possibly anticipate or relieve all potential conflicts of interest.

Conflicts of interest can arise when an advisor's interest is contrary to a client's. An example is when PFPG advises a client to annuitize investment assets, because doing so will reduce the client's net worth and therefore PFPG's advisory fee. Another example in which a conflict of interest arises is when PFPG advises a client to give away, or spend down, their assets. In these situations, we will recommend what is in the best interest of the client, even if that results in a material reduction of our fee income.

PFPG believes that the services and benefits provided to it by brokerage firms (custodians) and mutual fund providers do not materially affect the investment recommendations made to our clients. However, in the interest of full disclosure of any potential conflicts of interest, we discuss possible conflicts in Item 12 (Brokerage Practices).

Item 12 – Brokerage Practices

With your approval, PFPG places trades for your account(s), using broker-dealers/custodians that we reasonably believe will provide "best execution". Though we look for the lowest possible commission rates, we also take into consideration execution capability (how efficiently transactions are processed), the quality of customer service, and the value of investment research products and services provided to PFPG that help us monitor your account.

We generally recommend TD Ameritrade serve as the broker-dealer/custodian for your investment advisory assets, though you are free to select another custodian. We consider their financial strength, reputation, execution, pricing, research, and customer service to be superior. We receive daily electronic feeds tracking your account activity that allows us to produce detailed analyses of investment performance efficiently. TD Ameritrade Institutional enables us to trade certain no-load mutual funds without transaction charges, and other no-load and load-waived funds at nominal transaction charges. Their commission rates are generally considered discounted compared to customary retail commission rates.

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In return for the commissions earned through account trades, a broker/dealer such as TD Ameritrade may provide PFPG research products and services that assist us in our investment decision-making or practice management process. For example, we receive discounts on certain financial planning and investment software programs through our relationship with TD Ameritrade. PFPG's research generally will be used to service all of our clients, including those accounts that may not generate commissions used to pay for investment research. The brokerage commissions paid by you may be used to pay for research that is not necessarily used in managing your account specifically. We consider the value of the brokerage and research services provided to us in addition to seeking a competitive commission rate. Accordingly, we may not necessarily obtain the lowest possible commission rates for account transactions.

You may direct us to use a particular broker-dealer (subject to our right to decline and/or terminate the engagement) to execute some or all trades for your account(s). In that case, you will be responsible for negotiating terms and arrangements for your account with that broker-dealer, and PFPG will not seek better execution services or prices from other broker-dealers. As a result, you may pay higher commissions or other transaction costs, or greater spreads, or receive less favorable net prices, on trades than you would otherwise. High transaction costs adversely impact account performance.

PFPG does not participate in client referral programs sponsored by TD Ameritrade or by any other custodian.

Item 13 – Review of Accounts

For retainer clients, PFPG develops an initial investment plan followed by periodic reviews of the client's portfolio by Brian. Portfolio reviews are typically done on a quarterly or semi-annual basis. Reviews are also done at the specific request of the client, or when the financial markets experience a sharp change in value as during the 2008 financial crisis.

With limited exceptions, PFPG generally does not take discretionary authority over your assets. Trades are made only upon your consent, and you may implement any advice on your own or direct PFPG to execute specific transactions on your behalf. In limited circumstances, PFPG may accept discretionary authority over your account, in which case trades executed by PFPG shall align with the client's designated investment objectives and any restrictions imposed.

Most investment recommendations are made either to rebalance asset allocations to target weights or to manage cash flows created by withdrawals and contributions of funds by the

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client. Adjustments are sometimes recommended to harvest capital losses for their income tax benefit. Implementation usually consists of adding to or trimming balances in your existing mutual funds and exchange-traded funds. In addition, PFPG may recommend replacing a holding if we determine that another fund is more appropriate based on cost and performance.

PFPG may decide against rebalancing assets for a number of reasons: such as avoiding or deferring capital gains, minimizing transaction costs, or based on our assessment that an asset class is undervalued or overvalued relative to historic norms and economic conditions. You are contacted only in the event that rebalancing actions are recommended.

We encourage you to contact us promptly with any questions about your accounts, and to advise us of changes in your financial situation or investment objectives.

Item 14 – Client Referrals and Other Compensation

PFPG receives certain economic benefits from TD Ameritrade. See item 12 for more information.

PFPG does not pay or receive compensation from any other party for referrals.

Item 15 – Custody

You should receive account statements at least every quarter, either by mail or online, from the broker dealer, bank or other qualified custodian that holds and maintains your investment assets. All clients should carefully review these statements.

PFPG has entered into arrangements with several clients, including maintaining power of attorney over client accounts and establishing asset transfer authorizations with custodians, which impute custody on PFPG. These arrangements are disclosed at ADV Part 1, Item 9.

Pursuant to M.R.S.A. Rule Chapter 515, Section 11 (8), PFPG is deemed to have custody as a result of using direct fee deduction; however, PFPG will rely on the safeguards contained in paragraphs 8A & 8B in complying with this section. Clients are urged to compare the statements received from the custodian to reports and documentation provided by PFPG. The content of our reports may vary from custodial statements based on accounting procedures, reporting dates, or how certain securities are valued.

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Item 16 – Investment Discretion

Some clients may engage PFPG to provide investment advisory services on a discretionary basis. Prior to PFPG assuming discretionary authority over a client's account, the client shall be required to execute an Investment Advisory Agreement, naming PFPG as the client's attorney and agent in fact, granting PFPG full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage PFPG on a discretionary basis may, at any time, impose restrictions, in writing, on PFPG's discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe PFPG's use of margin, etc).

Item 17 – Voting Client Securities

PFPG does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings, or other type events pertaining to the client's investment assets. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact PFPG to discuss any questions they may have with a particular solicitation.

Item 18 – Financial Information

Licensed investment advisors who require prepayment of more \$500 in fees per client, six months or more in advance, are required to provide you with a balance sheet for the advisor's most recent fiscal year. PFPG does not require prepayments of this kind.

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Item 19 – Requirements for State-Licensed Advisors



Brian Luther Dietz, Principal, attained the Certified Financial Planner® (CFP®) designation¹ in 2001 and Chartered Financial Analyst² designation in 2002. His specialties include investments and retirement planning.

Brian was born in 1962 and received a B.A. degree in History from Yale University in 1984. He received his CFP® Certificate from the CFP Professional Education Program, College for Financial Planning, Denver, CO, in 1997 and passed the CFP Board of Standards exam that year. He has been a Principal at Portland Financial Planning Group since co-founding the firm in 1998.

Brian belongs to the [CFA Institute](#) and the Maine Estate Planning Council. He is also active in the National Association of Personal Financial Advisors (NAPFA). He was previously Secretary of the Genesis Community Loan Fund, which provides flexible, below-market financing and expert assistance to affordable housing and community groups across Maine. Brian has also served as Treasurer of the [Maine Planned Giving Council](#), a nonprofit organization devoted to the advancement of charitable giving across Maine.

Brian has been quoted in *Bloomberg News*, *Investment News* and the *Portland Press Herald*, and has also appeared on the newscasts of Portland's ABC and CBS TV stations. Before becoming a financial planner, Brian worked for many years in the publishing industry as a book editor and also owned a bookstore.

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¹ About the Certified Financial Planner® (CFP®) designation

While anyone can use the title “financial planner,” only those who have fulfilled the certification and renewal requirements of CFP Board can display the CFP® certification trademarks which represent a high level of competency, ethics and professionalism. And because they are held to a fiduciary standard of care when providing financial planning services, a CFP® professional is required to act in your best interest. There are currently more than 83,000 CFP® certificants worldwide.

In order to obtain the CFP® designation, a candidate must 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, effective in 2007, 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.

The candidate must pass the comprehensive CFP® Certification Examination, which includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s integrated knowledge of financial planning to real world circumstances. In addition, the candidate must complete 6,000 hours of professional experience related to the financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.

² About the Chartered Financial Analyst® (CFA®) designation

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential awarded by CFA Institute — the largest global association of investment professionals. There are currently more than 120,000 CFA charter holders. To earn the CFA charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

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The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charter holders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

THE NAPFA FIDUCIARY OATH

The advisor shall exercise his/her best efforts to act in good faith and in the best interests of the client. The advisor shall provide written disclosure to the client prior to the engagement of the advisor, and thereafter throughout the term of the engagement, of any conflicts of interest, which will or reasonably may compromise the impartiality or independence of the advisor.

The advisor, or any party in which the advisor has a financial interest, does not receive any compensation or other remuneration that is contingent on any client's purchase or sale of a financial product. The advisor does not receive a fee or other compensation from another party based on the referral of a client or the client's business.

WHAT THE FIDUCIARY OATH MEANS TO THE CLIENT:

- The advisor shall always act in good faith and with candor.
- The advisor shall be proactive in disclosure of any conflicts of interest that may impact the client.
- The advisor shall not accept any referral fees or compensation that is contingent upon the purchase or sale of a financial product.

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PFPG PRIVACY NOTICE

Portland Financial Planning Group, LLC is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic personal information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, mortgage lenders, and insurance agents with whom you have established a relationship. You may “opt out” from our sharing information with these unaffiliated third parties by notifying us at any time by telephone, mail, fax, e-mail, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not sell or otherwise provide your personal information to mailing list vendors or solicitors.

We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and thereafter as dictated by Federal and state law.

We will notify you in advance if we amend our privacy policy. We are required by law to deliver this *Privacy Notice* to you annually, in writing.