

How do you sift through the hype when looking for a comprehensive financial advisor? Will a firm with a huge advertising budget do the best job helping you meet life's financial goals? TV ads may talk about your hopes and dreams, but ultimately salespeople focus almost exclusively on selling investment products and insurance. Your financial situation is complex; a truly comprehensive financial advisor will analyze your current condition, make prudent recommendations and support you along the way.

The *Comprehensive Financial Advisor Diagnostic*, created by the National Association of Personal Financial Advisors (NAPFA) is a thorough questionnaire you can use to evaluate a financial advisor. The questions and popular *answer key* will help you make an informed decision based on the responses a financial advisor provides. Before hiring a financial planning professional, perform this simple diagnostic. If the advisor's answers do not follow prudent core values, you may not be engaging the right advisor for you.

1. What is your educational background?
 College Degree: Yes No Area of Study: Finance
 Graduate Degree: Yes No Area of Study: Law

2. What are your financial planning credentials/designations and affiliations? (Check all that apply)

| | |
|---|-------------------------------------|
| NAPFA-Registered Financial Advisor | <input checked="" type="checkbox"/> |
| Certified Financial Planner (CFP) | <input checked="" type="checkbox"/> |
| Chartered Financial Consultant (ChFC) | <input type="checkbox"/> |
| Certified Public Accountant/Personal Financial Specialist (CPA/PFS) | <input type="checkbox"/> |
| Master of Science, Financial Services (MSFS) | <input type="checkbox"/> |
| Financial Planning Association (FPA) | <input type="checkbox"/> |
| Other: _____ | |

3. How long have you been offering financial planning services?
 Less than 2 years 2-5 years 5-10 years More than 10 years

4. Will you provide me with references from other professionals?
 Yes No
 (If no, please explain) _____

5. Have you ever been cited by a professional or regulatory governing body for disciplinary reasons?
 Yes No
 (If yes, please explain) _____

6. How many clients do you work with? 37 Investment Management/250+ Hourly

7. Are you currently engaged in any other business, either as a sole proprietor, partner, officer, employee, trustee, agent or otherwise? (Exclude non-investment related activities which are exclusively charitable, civic, religious or fraternal and are recognized as tax-exempt.)
 Yes No
 (If yes, please explain) _____

8. Will you or an associate work with me?
 I will An associate will Act as a Team
 (If an associate will be my primary contact, complete questions 1-8 for each associate as well.)

Fee Offset, (charging a flat fee against which commissions are offset.) If the commissions exceed the fee, is the balance credited to me? Yes No

12. Do you have an agreement describing your compensation and services that will be provided in advance of the engagement?
 Yes No

13. Do you have a minimum fee?
 Yes No
(If yes, please explain) \$150,000 Minimum for Investment Management/None for hourly

14. If you earn commissions, approximately what percentage of your firm's commission income comes from:

| | |
|--------------------------------------|--|
| <u> </u> % Insurance products | <u> </u> % Stocks and bonds |
| <u> </u> % Annuities | <u> </u> % Coins, tangibles, collectibles |
| <u> </u> % Mutual Funds | <u> </u> % Limited Partnerships |
| <u> </u> % Other: <u> </u> | |

15. Does any member of your firm act as a general partner, participate in, or receive compensation from investments you may recommend to me?
 Yes No

16. Do you receive referral fees from attorneys, accountants, insurance agents, mortgage brokers, or others?
 Yes No

17. Do you receive on-going income from any of the mutual funds that you recommend in the form of "12(b)1" fees, "trailing" commissions, or other continuing payouts?
 Yes No

18. Are there financial incentives for you to recommend certain financial products?
 Yes No
(If yes, please explain)

Services

Financial planners provide a range of services. It is important to match your needs with services provided.

19. Do you offer advice on? (check all that apply)

| | | | |
|------------------------------|-------------------------------------|---------------------|-------------------------------------|
| Goal setting | <input checked="" type="checkbox"/> | Estate planning | <input checked="" type="checkbox"/> |
| Cash management & budgeting | <input checked="" type="checkbox"/> | Insurance needs | <input checked="" type="checkbox"/> |
| Tax planning | <input checked="" type="checkbox"/> | Education funding | <input checked="" type="checkbox"/> |
| Investment review & planning | <input checked="" type="checkbox"/> | Retirement planning | <input checked="" type="checkbox"/> |
| Other: <u> </u> | | | |

20. Do you provide a comprehensive written analysis of my financial situation and recommendations?

Yes No

21. Do you offer assistance with implementation with the plan?

Yes No

22. Do you offer continuous, on-going advice regarding my financial affairs, including advice on non-investment related financial issues?

Yes No

23. Other than receiving my permission to debit my investment account for your fee, do you take custody of, or will you have access to, my assets?

Yes No

24. If you were to provide me on-going investment advisory services, do you require "discretionary" trading authority over my investment accounts?

Yes No

Regulatory Compliance

Federal and state laws require that, under most circumstances, individuals or firms holding themselves out to the public as providing investment advisory services are required to be registered with either the U. S. Securities & Exchange Commission (SEC) or the regulatory agency of the state in which the individual/firm conducts business.

25. I am (or my firm) is registered as an Investment Advisor?

Yes (In the State of VA) No

Please provide your Form ADV Part II or brochure being used in compliance with the Investment Advisors Act of 1940. If not registered with either the SEC or any state, please indicate the specific reason (regulatory exemption or other reason) for non-registration.

Signature of Advisor: Marshall H. Groom, Jr., JD, CFP
Financial Advisory

Firm Name: Groom

Date: 3/21/2016

Please Note:

A yes or no answer requiring explanation is not necessarily a cause for concern. We encourage you to give the advisor an opportunity to explain any response. Information geared to the investing public can be found on the Securities & Exchange Commission website (www.sec.gov) under the "Investor Information" section.

This form was created by the National Association of Personal Financial Advisors (NAPFA) to assist consumers in selecting a personal financial advisor. It can be used as a checklist during an interview, or sent to prospective advisors as a part of a preliminary screening. NAPFA recommends that individuals from at least two different firms be interviewed.

Answer Key

Once you have a completed *Diagnostic* in hand it's time to evaluate the responses. NAPFA provides the following Answer Key based on the long-standing ideals of the organization:

Question #1 – Although not currently required by applicable regulatory authorities, NAPFA believes that a financial advisor should have an advanced education in financial planning topics such as investments, taxes, insurance, or estate planning in addition to a college degree. Also, NAPFA believes that your planner should be required to participate in continuing professional education to keep his/her knowledge base current.

Question #2 – There are a number of professional certifications or designations financial advisors can obtain, and each requires a different level of Continuing Education requirements to maintain. It is important to take the Continuing Education requirements into account when selecting an advisor, since one may assume the more Continuing Education required by the governing body she/he belongs to, the more knowledgeable the advisor. Continuing Education also helps advisors stay on top of trends in the industry, which should help them make better recommendations for your financial situation.

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|---|--------------------------------|
| • NAPFA-Registered Financial Advisor | = 60 hrs every 2 years |
| • Certified Financial Planner (CFP) | = 30 hrs every 2 years |
| • Chartered Financial Consultant (ChFC) | = 30 hrs every 2 years |
| • Certified Public Accountant/Personal Financial Specialist (CPA/PFS) | = 60* hrs every 3 years (min.) |
| • Financial Planning Association Member | = No CE required |

* Requirement ranges between 60 and 135 hours every three years based on total hours of business experience.

Question #3 – Just because someone has one of the above listed designations does not by itself mean that person is a truly competent financial advisor. You should carefully examine a person's background and experience when choosing an advisor; someone who has been in the industry longer and provides comprehensive financial planning may be a better fit for you, especially if you have a complicated financial situation.

Question #4 – If you request, the financial advisor filling out the Diagnostic should also be willing to share the name of another financial professional with whom he/she has worked. By talking with another financial professional who is familiar with the prospective financial advisor you might be better able to learn more about their abilities and strategies for recommending prudent courses of action. Privacy laws severely limit an advisor's ability to share client information.

Question #5 – Be wary of a financial advisor who has been disciplined by a professional or regulatory body. In many cases, financial advisors who are disciplined are being held accountable for imprudent advice or abuse. You should, however, give an advisor the opportunity to explain his/her side of the disciplinary incident.

Question #6 – Personal attention is important when engaging a financial advisor. The number of clients an advisor works with will help you better understand how much attention she/he will be able to devote to you and your situation. If the number of clients seems excessive, ask how advising that many clients will affect your relationship.

Question #7 – By knowing what other business ventures a financial advisor is involved in, you will better understand if there are any conflicts of interest with regard to the advice that you might receive. This is especially important if the advisor is involved with any other investment related entity. If there is a relationship in place with another conflicting organization, ask for a detailed account of how that relationship will impact the advice she/he will provide you.

Question #8 – When engaging a financial advisor, you will want to know whether you will be working with that person directly or another qualified professional who is part of a team. If the advisor indicates that an associate will primarily work with you, ask to meet that person prior to commencing the relationship.

Question #9 – Accountability is important in financial planning. While there are many people in the financial services industry who profess to have the client’s best interests at heart, they still may make recommendations that present a conflict of interest. NAPFA requires all of its members to sign a Fiduciary Oath; this helps to ensure that each client’s best interests, not the advisor’s, are always a priority.

Question #10 – A concern for many clients is they will retain the services of a financial advisor who might soon retire, pass away, or transition completely out of financial services. If any of these events were to occur, what would happen to you? You should ask your prospective financial advisor if she/he has a plan in place to address any potential situations whereby she/he might no longer be able to provide services. .

Question #11 – How should a financial advisor charge for services? The members of NAPFA firmly believe that financial advisors should charge Fee-Only. Although NAPFA recognizes that financial planners can provide services on a commission basis, it is NAPFA’s core position that a Fee-Only engagement removes the potential conflicts of interest that are inherent in a commission relationship.

Question #12 – Prior to formalizing a relationship, a financial advisor should always provide you information which clearly discloses how she/he will be compensated: Fee-Only, commissions, etc. Ask for this information prior to commencing a relationship, and if there are any corresponding conflicts of interest presented by the compensation arrangement.

Question #13 – Financial advisors may charge a minimum fee for services they render. If you have limited financial planning needs and/or a small portfolio, paying a minimum fee may not be in your best interests. If that is your situation, search for an advisor who will provide you professional advice on a flat-fee, project, or hourly basis.

Question #14 – While NAPFA encourages you to consider using a Fee-Only Financial Advisor to minimize the potential for conflicts of interest, you may instead select an advisor who accepts commissions. Financial advisors who are compensated based on commissions should be able to explain how they are compensated and identify what percentage of their compensation is derived from the sale of various commission-based investment products and/or securities trading.

Question #15 – Ask your prospective financial advisor if she/he is limited to presenting certain types of investments or investment products to you. If so, inquire why she/he is limited, and how this might impact the success of attaining your goals and/or the amount of fees to be paid.

Question #16 – As you work with a financial advisor, other needs revolving around important financial issues will become evident. Certain advisors, for example, recommend attorneys, accountants, insurance agents, and mortgage brokers to their clients. You should inquire whether the financial advisor will receive a referral fee from the recommended professional. If the financial advisor does receive a referral fee or some other type of compensation from the professional(s) that she/he may recommend to you, you should seriously consider this conflict of interest prior to engaging the recommended professional.

Question #17 – Some mutual fund and investment product sponsors pay 12b(1) and similar fees. A financial advisor who receives 12(b)1 fees or “trailers” is not a Fee-Only Financial Advisor. Trailing fees may negatively impact you, because typically the product sponsor charges shareholders higher fees and then pays a portion of the money to the financial advisor on an ongoing basis.

Question #18 – Commission-based advisors may receive higher commissions on certain products they sell than on others. This may influence their decision to recommend investment products that are not in your best interest. Ask your prospective financial advisor how his/her recommendation might impact the success of attaining your goals and/or the amount of fees to be paid. Fee-Only advisors do not have this conflict of interest; they are able to recommend investments based solely upon your specific needs.

Question #19 – Many financial professionals loosely use the term “Comprehensive” in describing their range of financial planning services. Financial planning is generally much more than simply developing a plan for primarily short-term objectives and reviewing the plan when appropriate. Comprehensive financial planning typically covers a wide range of both short- and long-term financial issues and addresses your personal goals, objectives and significant life cycle events. The more services your financial advisor provides, the greater your odds of receiving truly comprehensive financial planning.

Question #20 – The financial advisor that you engage should be willing and able to provide you with a written analysis of your current financial situation as well as appropriate corresponding recommendations to help you accomplish your objectives. This written analysis can serve as the starting point for beginning your client/advisor relationship.

Question #21 – The development of a comprehensive financial plan is the initial step to properly assessing your finances. A plan, however, has little value until it is implemented. As opposed to 'going it alone', consider having your financial advisor implement the plan. Fee-Only advisors can often reduce your investment costs by investing in assets with reduced annual expenses and no related sales commissions.

Question #22 – Some consumers find regular or periodic reviews and on-going communication necessary to remain on track toward achieving financial objectives. If this level of involvement is important to you, make sure the financial advisor you hire provides this ongoing support.

Question #23 – While allowing an advisor to debit your investment account for her/his fee is fairly typical, you should avoid permitting an advisor to have physical “custody of your investment assets”, or the ability to make withdrawals or transfers from your account(s) without express specific prior written consent prior to each such withdrawal or transfer. Generally, Fee-Only advisors will not expose their clients to these “custody” type situations. When you use a Fee-Only advisor, an unaffiliated brokerage firm will usually maintain physical custody of your investment assets.

Question #24 – If you grant an advisor “discretionary” trading authority over your investment account, the advisor can place orders to either buy or sell securities without consulting with you ahead of time. If you have granted your advisor “non-discretionary” trading authority, the advisor must obtain your approval prior to making any transactions in your account. If you are going to grant “discretionary” authority to your advisor, prior to making the initial investments, it is advisable to have a written document setting forth the terms and conditions of the discretionary engagement (usually set forth in an Investment Management Agreement). Additionally you should receive a corresponding written document setting forth the investment parameters for the accounts to be managed (i.e. investment objectives, percentage allocations, restrictions, etc), often referred to as an Investment Policy Statement. Of course, you should always continue to monitor the activity within your investment account to make sure that transactions are within the parameters of an agreed-upon investment policy.

Question #25 – NAPFA believes that any financial advisor offering comprehensive financial planning services should be registered as an investment advisor with either the U.S. Securities and Exchange Commission (SEC) or with the state regulatory agency within the advisor's state. Information pertaining to both SEC registered investment advisors (and the vast majority of state registered investment advisors) is set forth on Part I of the advisor's Form ADV (see www.sec.gov). Unlike other investment professionals, only registered investment advisors owe a fiduciary duty under law to their clients (i.e. they are required to always act in the best interests of their clients and to make full and fair disclosure of all material facts, especially when the adviser's interests may conflict with those of the client).