

WALLER FINANCIAL COACHING, INC.  
Form ADV Part 2A

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**Item 1 – Cover Page**

WALLER FINANCIAL COACHING, INC.

1024 Iron Point Road, Suite 100 #1292  
Folsom, CA 95630

(530) 826-4417

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

February 19, 2021

This Brochure provides information about the qualifications and business practices of Waller Financial Coaching, Inc., a California corporation (“Waller Financial”). If you have any questions about the contents of this brochure, you may contact us at (530) 826-4417 to obtain answers and additional information. Waller Financial is a registered investment advisor in the State of California. Registration of an investment adviser does not imply any level of skill or training. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”), the State of California or by any other state securities authority.

Additional information about Waller Financial is available on the SEC’s website at [www.Adviserinfo.sec.gov](http://www.Adviserinfo.sec.gov), which can be found using the firm’s identification number 172701.

Item 2 – Material Changes

Since Waller Financial Coaching's brochure filing on 3/1/2020, there has been several material changes.

Waller Financial Coaching is no longer providing Cash Flow and Budgeting support through NR Coaching.

Waller Financial Coaching website address has changed to <https://wallerfc.com>

Waller Financial Coaching is no longer working with Scott Smith of Rochester Hills, MI as a paraplanner.

Waller Financial Coaching is now assisting clients with tax preparation needs through XY Tax Solutions and services will be described in a separate agreement.

We will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary and will further provide you with a new brochure as necessary based on changes or new information, at any time, without charge.

Currently, our brochure may be requested by contacting Justin C. Waller at (530) 826-4417.

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#### **Item 4 – Advisory Business**

**A** Waller Financial Coaching, Inc. (“WFC”, “Waller Financial”, “Firm”, “or “we”), is a California corporation registered as an investment advisory firm with the State of California. Its principal place of business is located in Folsom, California. Justin C. Waller is a joint owner of this firm with Deborah S. Waller, his spouse.

Justin is the primary Financial Planner and investment advisor representative of the firm. The Firm has been operating since September 2014.

The firm periodically employs interns from the local university in an effort to educate young professionals.

#### **B Types of Advisory Services Investment Management Services**

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation target. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background. Account supervision is guided by the stated objectives of the client (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

We provide ongoing discretionary investment advisory services to our clients. Pursuant to an investment advisory agreement entered into with each client, we exercise discretion over your account, which means you have given us the authority to determine the following without your prior consent:

- Buy and sell securities in your account without obtaining your consent before each transaction
- Arrange for delivery and payment in connection with such transactions; and
- Act on your behalf in all matters necessary or incidental to the handling of your account.

A conflict exists between the interests of the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser.

#### **Investment Advisory Services**

We also offer investment advisory services by recommending clients, where appropriate, to sub-advisors for portfolio management services. We assist clients in selecting an appropriate allocation model, completing the sub-advisor's investor profile questionnaire, interacting with the sub-advisor and reviewing the sub-advisor. Our review process and analysis of outside

managers is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

Typical platforms used for these services are Focus Point Solutions with Fidelity, Betterment, and FeeX.

### **Financial Planning**

We provide financial planning services on topics such as retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the client. Clients purchasing this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address any or all of the following areas of concern. The client and planner will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

1. **Business Planning:**

We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.

2. **Cash Flow and Debt Management:**

We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

3. **College Savings:**

Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).

4. Employee Benefits Optimization:

We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

5. Estate Planning:

This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

6. Financial Goals:

We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.

7. Insurance:

Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.

8. Investment Analysis:

This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

9. Retirement Planning:

Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to alter spending during your retirement years adversely.

10. Risk Management:

A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial pictures, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").

11. Tax Planning Strategies:

Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

12. Tax Preparation:

We offer tax preparation services to our ongoing financial planning clients and our investment management clients to assist with the filing of federal and state tax returns for individuals, trusts, and businesses. Tax Preparation is not available as stand-alone services.

**The fees associated with tax preparation and tax planning services are separate and in addition to your ongoing financial planning or advisory fees and are disclosed in Item 5.**

We will utilize the services of XY Tax Solutions "XYTS", a third-party accounting and tax planning firm, to facilitate the preparation and filing of your tax return and we will work with you and XYTS to gather the necessary information as part of this service. If the client also engages us for Tax Planning Services, XYTS's licensed CPAs will work with the client to also conduct research and answer tax-related questions to help the client adequately plan through certain transactions and financial changes so that they can fully understand any tax consequences or opportunities for savings in the future.

Tax Preparation: XYTS will bill you directly for Tax Preparation and Planning Services. Their fees will be reviewed and agreed to in your agreement with them at the start of the engagement.

## Full Financial Planning

The most commonly used model among our clients involves working one-on-one with a planner over an extended period. By spreading out the annual cost of planning into a monthly payment, clients receive ongoing access to a planner who will work with them to design their plan without necessarily paying all of the fee upfront. The planner will monitor the plan, recommend any changes and ensure the plan is up to date on a periodic basis.

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Upon desiring a comprehensive plan, a client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning and estate planning.

Their plan will be built and analyzed by Justin Waller, and then the findings, analysis, and potential changes will be reviewed with the client. If a follow-up meeting is required, we will meet at the client's convenience. The plan will be monitored throughout the year, and follow-up phone and video calls and emails will be made to the client to confirm that any agreed upon action steps have been carried out. On an annual basis, there will be a full review of this plan to ensure its accuracy. Any needed updates will be implemented at that time.

- C** Before implementing an investment program, and periodically after that, we meet with each client to discuss and document their investment goals and objectives. All of our investment decisions are made by investment guidelines which fit a client's investment needs. You are obligated to notify us promptly when your financial situation, goals, objectives, or needs change.

If you decide to implement an investment management strategy with us, we will help you open a custodial account(s). The funds in your account will be held in your name, in a separate account at an independent custodian, not with us. We recommend using Fidelity, or Betterment Institutional as your custodian. However, you have the right to use another custodian to handle your account. You will enter into a separate custodial agreement with the custodian. The custodian will effect transactions, deliver securities and make payments. You will receive, at least quarterly, a statement containing a description of all the activity in your account from the custodian. This statement lists the total value at the start of the quarter, itemizes all transaction activity during the quarter, and lists the types, amounts, and the total value of securities held as of the end of the quarter. Your statement may be in either printed or electronic form based upon your preferences. You will at all times maintain full and complete ownership rights to all assets held in your account, including the right to withdraw securities or cash, proxy voting and receiving transaction confirmations. You will also receive our Advisory Agreement which describes what services you will receive and what fees you will be charged.

- D** We do not participate in any wrap fee programs. However, we may refer clients to a wrap fee manager and receive a fee for the service. Clients will be charged the fee by the Advisor as stated in their Investment Advisory Agreement. Advisor will subsequently share a portion of that fee with sub-Advisor based on their agreement for sub-advisory services. See Item 10D below for information regarding sub-advisors.
- E** As of January 1, 2021, we managed approximately \$43,421,000 of client assets on a discretionary basis.

### Item 5 – Fees and Compensation

**A** For our investment advisory services, you pay us a quarterly fee in arrears. Your fee is based on the market value of your account on the last trading day of the quarter. While the following is our normal fee schedule, fees may be negotiated individually. Each specific client fee arrangement is outlined in the client agreement.

Customized Portfolio Management (Fidelity)		
Account Value		Annual Advisory Fee
Less than \$250,000		1.40%
\$250,000	to \$499,999	1.30%
\$500,000	to \$749,999	1.10%
\$750,000	to \$999,999	1.00%
Greater than	\$1,000,000	Negotiable
Standard Investment Platform (Betterment For Advisors)		
Account Value		Annual Advisory Fee
Less than \$500,000		0.79%
\$500,000	to \$999,999	0.69%
Greater than	\$1,000,000	Negotiable
Management for Held Away Assets i.e. 401(k)'s etc. (FeeX)		
Less than \$5,000,000		0.25% + \$250 per hour

*Please note, the above fee schedule **does** include the Outside Manager's fee.*

Hourly investment advisory services are charged at a rate of \$250 per hour.

Each client's specific fee schedule is documented in their investment advisory agreement. We may amend this fee schedule upon 30-days prior written notice. Fees may be negotiable in certain limited circumstances.

Financial planning services are charged hourly at \$250 per hour or at a fixed fee based on whether the engagement will be one-time or ongoing, the complexity, scope, and breadth of the project, and how often the parties will meet. Fixed fees range from \$1,500 to \$30,000 per year. All flat fees are based on complexity and charged annually. Fees are reassessed at least once every third year.

To clarify Financial Planning relationship terminology, there are typically three levels of ongoing service.

- 1) Coaching – Hourly work - \$250/hour
- 2) Consulting – Project work – \$1,500 - \$5,000
- 3) Comprehensive – Financial Planning and Investment Management - \$2,400 - \$20,000

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Ongoing client fees will be paid monthly, quarterly, etc. The specifics of the arrangement will be outlined in the individual financial planning agreement.

In accordance with California Code of Regulations Section 260.238(j), lower fees for comparable advisory services may be available from other sources.

The fees for Personal Tax Return Preparation will be determined based on the complexity of the return and quality of the client's recordkeeping. These fees are typically computed based on the types and numbers of forms that are required for filing. The fees may be negotiable in certain cases, will be agreed to at the start of the engagement, and are due at the end of the engagement. Clients are not required to utilize any thirdparty products or services that we may recommend and they can receive similar services from other professionals at a similar or lower cost.

**B** Payment is due within 30 days from the last day of the quarter or for hourly clients 30 days from the date of the advisor's invoice. You may choose to give us the authority to deduct your fees directly from your account. In such cases, our sub-advisors submit invoices to your custodian showing the fee, and we send you an invoice showing the fee, the value of the assets on which the fee is based and the specific manner in which the fee was calculated. We may liquidate securities in your account if it has insufficient cash to pay your fee.

**C** MUTUAL FUND FEES

For the portion of your assets invested in mutual funds, you may be required to pay a proportionate share of the mutual funds' fees and charges, which are disclosed in each fund's prospectus. Mutual fund fees may include, but are not limited to, a management fee; upfront sales charges; 12b-1 fees to cover the mutual fund's promotion, distribution, and marketing expenses and sometimes commissions; and other fund expenses. We do not receive any compensation from these fees. These fees are in addition to the management fees we charge.

You should review all fees charged to understand the total amount of fees you will pay fully. Services similar to those offered by us may be available elsewhere for more or less than the amounts we charge.

You could invest in a mutual fund directly, without our services. In that case, you would not receive the services provided by us which are designed, among other things, to assist you in determining which funds are most appropriate to your financial condition and objectives.

OTHER FEES

You are also responsible for the following fees, which may be more commonly charged by the custodian, transfer agent or another similar party, but in some limited instances may be charged by WFC:

- (a) Brokerage commissions;
- (b) Custodial fees and service charges;
- (c) Stock transfer fees and similar charges incurred in connection with transactions in your

account, including postage, copying, and shipping charges more than \$50.00 per quarter; and

- (d) Fees and costs for services above and beyond the ordinary course of our advisory services, including irregular valuations, account splitting, and other matters requiring the engagement and use of third-party accountants and tax professionals.
- (e) Deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees.
- (f) Clients are responsible for transaction charges that are outside of model changes and not based on the advice of the management team.

**D** If the advisory contract is terminated before the end of the billing period, the market value will be construed to equal the sum of the values of all assets in the account. Fees for partial quarters at the commencement or termination of this Agreement will be billed on a pro-rated basis contingent on the number of days the account was open during the quarter.

Either party may terminate the advisory contract at any time by providing a thirty (30) day written notice to the other party. You will incur charges for advisory or consulting services rendered up to the point of termination, and such fees will be due and payable by you within thirty (30) days of being billed.

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

We do not charge any performance-based fees for our services or perform side-by-side management.

#### **Item 7 – Types of Clients**

We provide investment advice to individuals, high net worth individuals, corporations, and pension and profit sharing plans. Because each client is unique, they must be willing to be involved in the planning and ongoing processes. Such involvement does not have to be time-consuming. However, we want our clients to remain informed and have a sense of security about their investments.

A minimum investment account size may apply at our discretion.

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

**A** We offer advice on investments primarily including (but not limited to) the following:

- Mutual Funds that invest in
  - US equity securities
  - US corporate
  - US, state and municipal government debt securities
  - Foreign equity securities
  - Foreign corporate and/or government debt securities
- Exchange Traded Funds (“ETFs”)

In certain limited accounts:

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- US equity securities
- US corporate debt
- US government, state and municipal debt securities
- Warrants
- Certificates of deposit

We engage the services of at least two third-party investment advisors, FocusPoint Solutions, Inc. ("FPS"), and Betterment Institutional, which provide us with research information, portfolio analysis, performance reporting, investment execution services, and operational services. In addition to the research and portfolio analysis provided by FPS, we primarily research and analyze securities using traditional fundamental analysis.

We may use one or more of the following methods of analysis in structuring investment portfolios that we recommend to clients. The first factor is top-down global macroeconomic analysis, which involves an analysis of the prevailing economic, demographic, and social trends at a country level, then industry level and ultimately at the specific security level. The primary investment strategies used to implement investment advice given to clients include long-term purchases (securities held at least one year), short-term purchases (securities sold within a year).

When considering the mutual funds and exchange-traded funds, which make up the majority of the investments selected for client portfolios, we perform qualitative factors such as the background and experience of the fund manager/fund company. This includes style, consistency, performance, management expenses among other factors.

The main sources of information we rely upon when performing our research and analyzing securities include traditional research materials such as financial newspapers and magazines, research materials prepared by others, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Investing in securities carries a risk of loss that you should be prepared to bear. Clients assume all market risk involved in the investment of account assets under the Investment Advisory Agreement and understand that investment decisions made for this account are subject to various market, currency, economic, political and business risks.

We will use our best judgment and good faith efforts in rendering services to our clients. However, we cannot warrant or guarantee any particular level of account performance, or that an account will be profitable over time. Not every investment decision or recommendation made by us will be profitable. Losses can and will occur. Clients are reminded that past performance is not an indication of future success and that the risks of investing include the following:

**B** Fundamental Analysis Risk. When used in isolation, fundamental analysis has some risks:

- There are an infinite number of factors that can affect the earnings of a company, and its stock price, over time. These can include economic, political and social factors, in addition to the various company statistics.
- When using this method with mutual funds, the funds are composed of many companies,

and not all of them will be undervalued.

- The data used may be at least six months out of date.
- It is difficult to give appropriate weightings to the factors.
- It assumes that the analyst is competent.
- A fundamental analyst assumes that other fundamental analysts will form the same view about the company and buy the stock, which may not happen.
- It ignores the influence of random events such as oil spills, product defects being exposed, and acts of God and so on.
- It assumes that there is no monopolistic power over markets.

Market Risk: The value of the holdings in your portfolio may decline over a short, or even an extended period of time, resulting in a decrease in the value of your investment.

Investment Management Risk: WFC may be incorrect in its judgment of the value of particular investments. The investments may not perform as anticipated. There is no assurance that your objectives will be achieved.

Passive Investment Management: We additionally practice passive investment management as a partial interest in portfolios. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

Passive investment management is characterized by low portfolio expenses (i.e., the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax-efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market.

Other Risk factors may include but are not limited to, catastrophic events such as war, terrorism, natural calamity, interest rate risk, and credit risk.

Except as may otherwise be provided by law, we are not liable to clients for:

- Any loss that client may suffer because of any investment decision made or other action taken or omitted in good faith by us with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use;
- Any loss arising from our adherence to client's instructions; or
- Any act or failure to act by a custodian of client's account. However, nothing in this Agreement shall relieve us from any responsibility or liability we may have under state or federal statutes.

It is the responsibility of each client to give us complete information and to notify us of any changes in financial circumstances or goals. Please contact us immediately to notify us of any material changes to your circumstances or in your risk tolerance or investment objectives.

C. Our advisory services recommend exchange-traded funds, mutual funds, stocks and bonds for investment purposes.

D. Material Risks Involved

**All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission 12 expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

**Concentration Risk:** Certain investment strategies focus on particular asset classes, industries, sectors, or types of investment. From time to time, these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed-income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

**Timing Risk:** It is possible that you could have the right idea and it is the wrong time, either too early or too late.

### **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could hurt the price of all stocks.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values, and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most 13 other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Options and other derivatives** carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

**Investment Companies Risk.** When a client invests in open-end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. Also, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above

or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which client's invest.

### **Item 9 – Disciplinary Information**

We are required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of our Firm, or the integrity of our management. The Firm has no information to disclose applicable to this Item.

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

- A** No management persons or other employees of the Firm are registered or have an application pending to register, as a broker-dealer or registered representative of a broker-dealer.
- B** Neither the Firm nor any management person are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.
- C** Neither the Firm nor any management person have any relationship or arrangement that is material to the Firm's advisory business or to the Firm's clients. WFC has no "related persons" which for the purposes of this Item, is defined as: broker-dealer, municipal securities dealer, or government securities dealer or broker; investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund); other investment adviser or financial planner; futures commission merchant, commodity pool operator, or commodity trading advisor; banking or thrift institution; accountant or accounting firm; lawyer or law firm; insurance company or agency; pension consultant; real estate broker or dealer; and sponsor or syndicator of limited partnerships.
- D** WFC does not participate in any wrap-fee programs either as the wrap manager or sub-advisor. WFC may recommend a client to an unaffiliated advisor, which may pay a fee to WFC. If specifically allowed for and disclosed in that advisory agreement, WFC may receive a portion of that other manager's advisory fee. That payment will not increase the fees paid by any client.

### **Recommendations or Selections of Other Investment Advisers**

As referenced in Item 4 of this brochure, Waller Financial Coaching recommends clients to Outside Managers to manage their accounts. If we recommend an Outside Manager, please note that we do not share in their advisory fee. Our fee is separate and in addition to their compensation (as noted in Item 5) and will be described to you prior to engagement. You are not obligated, contractually or otherwise, to use the services of any Outside Manager we recommend. Additionally, Waller Financial Coaching will only recommend an Outside Manager who is properly licensed or registered as an investment adviser.

### Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading

**A** As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employees, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any client or prospective client upon request.

**B-D** Waller Financial or individuals associated with our Firm may buy and sell some of the same securities for our own account that we buy and sell for our clients. In all instances, where appropriate, we will purchase (or sell) a security for all of our advisory accounts for which the investment is appropriate before purchasing (or selling) any of the securities for our own account. In some cases, we may buy or sell securities for our own account for reasons not related to the strategies adopted by our clients.

When we are newly engaged by an investment advisory client for whom we expect to recommend securities in which our investment advisor representatives or principals hold a position, we will notify the new client of any policies in respect to principals trading for their own accounts.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in your favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interest of all the accounts we advise.

## Item 12 – Brokerage Practices

**A** Although clients may direct us to use a broker-dealer of their choosing; we generally recommend that clients open brokerage accounts with Fidelity or Betterment. In recommending broker-dealers, we seek to obtain “best execution,” meaning that we seek to execute securities transactions for clients so that the total costs or proceeds in each transaction are the most favorable under the circumstances. The factors we consider when evaluating for best execution include:

- Execution capability;
- Commission rate;
- Financial responsibility;
- Responsiveness;
- Custodian capabilities;
- The value of any research services/brokerage services provided; and
- Any other factors that we consider relevant.

However, if the client selects the broker-dealer of their own choosing, we may be unable to seek best execution of your transactions, and your commission costs may be different than those of our recommended broker-dealers. Also, we may place your transactions after we place transactions for clients using our recommended broker-dealers.

## THE CUSTODIAN AND BROKERS WE USE

Waller Financial Coaching does not maintain custody of your assets on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw advisory fees from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend our clients use Fidelity or

Betterment Securities ("Betterment Securities"), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Fidelity or Betterment Securities. Fidelity and/or Betterment Securities will hold your assets in a brokerage account and buy and sell securities when we and/or you instruct them to. While we recommend that you use Fidelity or Betterment Securities as custodian/broker, you will decide whether to do so and will open your account with Fidelity or Betterment Securities by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Fidelity or Betterment Securities, then we cannot manage your accounts.

#### HOW WE SELECT BROKERS/CUSTODIANS

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Capability to execute, clear, and settle trades (buy and sell securities for your account) itself or to facilitate such services.
- Capability to facilitate timely transfers and payments to and from accounts.
- Availability of investment research and tools that assist us in making investment decisions.
- Quality of services.
- Competitiveness of the price of those services and willingness to negotiate the prices.
- Reputation, financial strength, and stability.
- Prior service to us and our other clients.

#### YOUR BROKERAGE AND CUSTODY COSTS

##### FIDELITY AND FOCUS POINT SOLUTIONS

For our clients' accounts that Fidelity maintains, Fidelity generally does not charge you separately for custody services but is compensated as part of the Focus Point Solutions platform fee, which is a percentage of the dollar amount of assets in the account instead of commissions. We have determined that having Focus Point Solutions execute trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How we select brokers/custodians").

##### SERVICES AVAILABLE TO US VIA FIDELITY AND FOCUS POINT SOLUTIONS

Fidelity serves as broker-dealer, and Focus Point Solutions serves as Sub-Advisor. Fidelity and Focus Point make available various support services which may not be available to Fidelity's retail customers. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Fidelity support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Fidelity/Focus Point support services:

1. SERVICES THAT BENEFIT YOU. Fidelity and Focus Point Solutions includes access to a range of investment products, execution of securities transactions, and custody of client assets through Fidelity.
2. SERVICES THAT MAY NOT DIRECTLY BENEFIT YOU. Fidelity and Focus Point Solutions also makes available to us other products and services that benefit us, but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts, such as software and technology that may: – Assist with back-office functions,

record keeping, and client reporting of our clients' accounts. In – Provide access to client account data (such as duplicate trade confirmations and account statements). – Provide pricing and other market data. – Assist with back-office functions, record keeping, and client reporting.

3. SERVICES THAT GENERALLY BENEFIT ONLY US. By using Fidelity and Focus Point Solutions, we will be offered other services intended to help us manage and further develop our business enterprise. These services include: – Educational conferences and events. – Consulting on technology, compliance, legal, and business needs. – Publications and conferences on practice management and business succession.

For our clients' accounts that Betterment Securities maintains, Betterment Securities generally does not charge you separately for custody services but is compensated as part of the Betterment Institutional (defined below) platform fee, which is a percentage of the dollar amount of assets in the account instead of commissions. We have determined that having Betterment Securities execute trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How we select brokers/custodians").

#### BETTERMENT INSTITUTIONAL

##### SERVICES AVAILABLE TO US VIA BETTERMENT INSTITUTIONAL

Betterment Securities serves as broker-dealer to Betterment Institutional, an investment and advice platform serving independent investment advisory firms like us ("Betterment Institutional"). Betterment Institutional also makes available various support services which may not be available to Betterment's retail customers. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Betterment Institutional's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Betterment Institutional's support services:

1. SERVICES THAT BENEFIT YOU. Betterment Institutional includes access to a range of investment products, execution of securities transactions, and custody of client assets through Betterment Securities. Betterment Securities' services described in this paragraph generally benefit you and your account.

2. SERVICES THAT MAY NOT DIRECTLY BENEFIT YOU. Betterment Institutional also makes available to us other products and services that benefit us, but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts, such as software and technology that may: – Assist with back-office functions, record keeping, and client reporting of our clients' accounts. In – Provide access to client account data (such as duplicate trade confirmations and account statements). – Provide pricing and other market data. – Assist with back-office functions, record keeping, and client reporting.

3. SERVICES THAT GENERALLY BENEFIT ONLY US. By using Betterment Institutional, we will be offered other services intended to help us manage and further develop our business enterprise. These services include – Educational conferences and events. – Consulting on technology, compliance, legal, and business needs. – Publications and conferences on practice management and business succession.

4. WFC pays Betterment Institutional a separate fee for access to technology resources.

## Soft Dollars

Focus Point Solutions, Inc. ("FPS"), a firm that provides certain administrative services to Waller Financial Coaching as discussed earlier in this document, may provide us with certain operational, research products and services that qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act"). These services are received by FPS from brokerages that execute investment transactions for the clients of FPS and other advisors such as WFC. Specific technology software services are received by WFC from brokerages through FPS. These research products and/or services will assist the Advisor in its investment decision-making process and in the investment supervision of its client accounts. Such research generally will be used to service all of the Advisor's clients, but brokerage charges paid by the client may be used to pay for research that is not used in managing the client's account. The account may pay to a Broker-Dealer a charge greater than another qualified Broker-Dealer might charge to effect the same transaction where the Advisor determines in good faith that the charge is reasonable in relation to the value of the brokerage and research services received.

Waller Financial may also receive other benefits such as software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Other services may include, but are not limited to, performance reporting, contact management systems, third-party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third-party service providers who provide a wide array of business-related services and technology with whom the Firm may contract directly.

While we do not pay a fee for these products/services, all client accounts may not be the direct or exclusive beneficiary of such products/services. Based upon the receipt of such services and information, we may have an incentive to select a broker-dealer based upon our desire to receive these services rather than receiving best execution for you. We have an obligation to seek best execution for you. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Broker-Dealer's services including the value of research provided, execution capability, commission rates, and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

## Brokerage for Client Referrals

We do not receive any compensation or incentive for referring you to broker-dealers for brokerage trades.

- B** WFC owners and/or employees may buy or sell for their own account(s) the same securities that are purchased or sold for clients. The following controls restrict this practice:

- We are required to uphold our fiduciary duty to our clients;
- We are prohibited from misusing information about our clients' securities holdings or transactions to gain any undue advantage for ourselves or others;
- We are prohibited from buying or selling any security that we are currently recommending for client accounts, unless we participate in an aggregated trade with clients, or unless we place our orders after client orders have been executed; and
- We are required to periodically report our securities holdings and transactions to Justin C. Waller, who must review those reports for improper trades.

### **Item 13 – Review of Accounts**

- A** All accounts are reviewed by Justin C. Waller. Mr. Waller reviews accounts periodically to monitor the performance of individual securities and the overall performance of the account. On an annual basis, Mr. Waller reviews with each client the asset allocation strategy for each account for the following year.
- B** More frequent reviews may be triggered by a change in client's investment guidelines; tax considerations; large deposits or withdrawals; large security sales or purchases; loss of confidence in corporate management objectives; or, changes in the macroeconomic climate.
- C** Clients may elect to receive monthly statements reflecting the securities holdings and month-end value of each account. On a quarterly basis, clients receive a report regarding the overall performance of the accounts managed by the Adviser.

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

- A** As referenced in Item 12 above, Focus Point Solutions ("FPS") provides investment research products and/or services which assist us in our investment decision-making process. Such research generally will be used to service all client accounts. The receipt of investment research products and/or services poses a conflict of interest because we are incentivized to use FPS for client accounts over other firms because we receive these products and services in addition to traditional custodial services.

Indirectly and through the Firm's relationship with FPS, the Firm receives, without cost to the Firm, computer software and related systems support, which allows the Firm to better monitor accounts. We receive software and related support without cost because our clients maintain assets with these custodians. The software and related systems support benefits us, but may not benefit the clients directly. Our receipt of these types of benefits from a custodian creates a conflict of interest since these benefits may influence our recommendation of one custodian over another that does not furnish similar software, systems support, or services. Additionally, we

receive: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively service the custodians' respective institutional division participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to accounts; and access to an electronic communication network for order entry and account information.

Many of the above benefits are considered to be "soft dollar" arrangements. As a result of receiving such products and services for no cost, we have an incentive to recommend to clients custodians that offer soft dollar arrangements. However, these types of arrangements are similar and common to the custodial relationships of other registered investment advisory firms in the industry. We periodically evaluate custodians to determine whether the benefits we receive are reasonable about the value of services provided to our clients.

Due to our affiliation with FPS, we have an incentive to recommend Fidelity as a custodian for client accounts. FPS has entered into a support services agreement with Fidelity Brokerage Services LLC and National Financial Services LLC (together referred to as "Fidelity"). Under this agreement, Fidelity pays FPS a support fee based on a portion of client assets in the custody of Fidelity. However, FPS and Fidelity have agreed that no support fee payments will be made with respect to investments in transaction fee funds and Fidelity sponsored funds. Under this arrangement, FPS provides numerous and substantial services to RIA firms like WFC that would normally be provided by the custodian (for example, back office, administrative and clerical services). While this arrangement results in cost savings for the custodian and increased costs for FPS, the receipt of this additional compensation may create an incentive for WFC to recommend funds available through the Fidelity platform for which (i) Fidelity is not a sponsor or manager, and (ii) transaction fees are not imposed (together, "NTF Funds"). It would not be unusual for the majority of investments made through the Fidelity platform to be in NTF Funds, for which FPS would receive support fees. Because FPS generally pays custodial trading costs for the trades recommended by us, there may also be an incentive to make fewer trading recommendations in ordinary transaction fee funds to control trading expenses. These conflicts of interest may influence our recommendation of one custodian over another that does not furnish similar benefits. However, these conflicts are mitigated by our fiduciary duty to put our clients' interests first. The Firm reviews what types of funds are available for use in client portfolio allocations and seek those that are the most suitable, appropriate and in the client's best interest.

We receive a non-economic benefit from Betterment Institutional and Betterment Securities in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Betterment Securities. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of Betterment Institutional and Betterment Securities' products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

- B** Neither the Firm nor any related person is compensated by others or compensates others for client referrals.
- C** Solicitors Agreements:

We may pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their clients to our firm in accordance with Rule 206 (4)-3 of the Investment Advisers Act of 1940. Such referral fee represents a share of our investment advisory fee charged to our clients. This arrangement will not result in higher costs to you. In this regard, we maintain Solicitors Agreements in compliance with Rule 206 (4)-3 of the Investment Advisers Act of 1940 and applicable state and federal laws.

Waller Financial Coaching may enter into referral arrangements with these related companies whereby WFC and a related company will share revenue for referrals. Any referral arrangement, as well as the affiliation of the companies, are fully disclosed to clients in advance and will not result in higher fees to referred clients for advisory or any other service.

### **Item 15 – Custody**

We do not have physical custody of any accounts or assets. However, we may be deemed to have custody of your accounts if we have the ability to deduct your quarterly fees from the custodian. We primarily use Fidelity and Betterment as the custodian for your accounts. We urge you to carefully review such statements and compare this official custodial record to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. If you notice any discrepancies, please contact Justin Waller.

We do not debit the client fees directly from your advisory account. Only the custodian has the authority to directly charge and debit the advisory fee to your account. Our sub-advisors prepare the invoices and submit billing information to the custodian. The sub-advisors then take their fees (platform fees) and forward the remaining fees to Waller Financial Coaching. The custodian will provide you immediate transaction confirmations and quarterly statements either by mail or electronically per your request. Quarterly statements list the total value of the account at the start and end of the quarter and itemize all transactions and security positions. For taxable accounts, the custodian will provide you consolidated year-end summary statements including IRS forms 1099 and other tax-related forms, as applicable. We are not allowed to make alterations or amendments to the custodian's statement. This preserves the integrity of the Custodian's statement and provides you with an independent appraisal of the account.

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Betterment Securities to deduct our advisory fees directly from your account. Fidelity or Betterment Securities maintains actual custody of your assets. Your statements will be available for you to review on the activity section of your account portal. You will also receive account statements directly from your custodian at least quarterly in hard copy format or via the custodian website. You should carefully review those statements promptly.

## Item 16 – Investment Discretion

INVESTMENT DISCRETION – Our investment advisory agreement gives us discretionary authority to make investment decisions for your

- ❖ We must make investment decisions in accordance with investment objectives documented in our investment advisory agreement, investment policy statement or with any other written directions or preferences you provide to us.
- ❖ We may aggregate client orders, so long as it is done for purposes of achieving best execution, and so long as no client is systematically advantaged or disadvantaged. Before aggregating client orders, we document the participating accounts and the allocation instructions. We submit allocation instructions to the broker-dealer via FPS before the market closes on the day of the order. We allocate aggregated orders to client accounts at the average price obtained. We allocate partially filled orders pro rata based on the size of the order placed by each account. If we judge that we cannot or should not allocate a partially filled order pro rata (e.g., if the quantity of securities obtained is too small or would not have a material impact if distributed among each account), then we apply the following procedures:
  - We allocate the order to client accounts only (i.e., no employees that participated in the order may receive any allocation); and
  - We document our allocation decision.

For Sub-Advisory accounts with Fidelity (Focus Point Solutions) and Betterment Institutional, Waller Financial Coaching also has discretion.

TRADE ERRORS – We have adopted the following policies and procedures to address the potential of trade errors:

- We will promptly correct all trade errors;
- We will bear any costs of correcting trade errors;
- We will allow clients to keep any gains resulting from trade errors;
- We will promptly notify a client if a trade error results in reimbursement to the client;
- We will not use a client's account to correct a trade error unless the trade was originally intended for that client's account;
- We will not use soft dollars to correct trade errors; and
- We will document trade errors.

### **Item 17 – Voting Client Securities**

We do not have authority to vote and therefore do not vote client securities. Additionally, we do not provide advice to clients on how the client should vote. clients will receive proxies and other solicitations directly from the custodian or transfer agent. If any proxy materials are received on behalf of a client, they will be sent directly to the client or a designated representative of the client, who is responsible for voting the proxy.

### **Item 18 – Financial Information**

- A** We do not require prepayment of fees.
- B** We do have discretionary authority over certain client's funds or securities; however, we have no financial condition that is reasonably likely to impair our ability to meet our fiduciary and contractual commitments to our clients.
- C** We have not been the subject of any bankruptcy proceedings.

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

- A** This information is provided on Mr. Waller's Form ADV Part 2B.
- B** This information is provided on Mr. Waller's Form ADV Part 2B.
- C** We do not receive performance-based fees.
- D** Mr. Waller has nothing to disclose related to this item.
- E** Mr. Waller does not have any relationships or arrangements with any securities issuers.

Under California Code of Regulations Section 260.238 (k), any material conflicts have been disclosed.

WALLER FINANCIAL COACHING, INC.  
Part 2B of Form ADV – Supplemental Brochure

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JUSTIN C. WALLER, CFP®

WALLER FINANCIAL COACHING, INC.

1024 Iron Point Road, Suite 100 #1292  
Folsom, CA 95630

(530) 826-4417

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

February 19, 2021

This Brochure Supplement provides information about Justin C. Waller, Investment Advisor Representative with Waller Financial Coaching, Inc. ("Waller Financial"). You should have received a copy of Waller Financial Coaching's Brochure. Please contact us at (530) 826-4417 if you did not receive a Brochure, or if you have any questions about the contents of this Supplement.

Justin C. Waller has achieved the designation of Certified Financial Planner (CFP®). This designation is explained more fully under Item 2, below. Additional information about Waller Financial and/or Justin Waller is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the firms identification number 172701.

## Item 2 Educational Background and Business Experience

### **Justin C. Waller, CFP®**

Year of Birth: 1975

Sole Investment Advisor Representative, Waller Financial Coaching, Inc.

### **Education**

Certificate in Personal Financial Planning, University of California, Davis, CA 2002

B.S. Majoring in Business Administration with an emphasis in Strategic Management, California State University, Chico, CA 1998

### **Business Background**

2014 to Present	Owner and Financial Planner Waller Financial Coaching, Inc.
2009 to 2015	Investment Advisor Representative The H Group, Inc.
2009 to 2011	Registered Representative Financial Network Investment Corporation,
2000 to 2009	Registered Representative Ameriprise Financial Service, Inc.

### **Industry Examinations and Professional Designations:**

Justin Waller has previously taken and passed the following industry examinations: Series 6, 7, 66. He no longer holds these licenses. He has also obtained the designation of Certified Financial Planner® (CFP®). The minimum qualifications required for the CFP® designation are provided below to assist you in understanding the value of the designation.

**Information regarding the Certified Financial Planner™ designation:** CFP® and federally registered CFP (with a flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (CFP Board).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and some other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial

planning subject areas that CFP Board's studies have determined are necessary for the competent and professional delivery of financial planning services and attain a bachelor's degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by the CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Item 3 Disciplinary Information**

Mr. Waller has not been subject to any legal or disciplinary proceedings which would be considered material (or otherwise) to a client's evaluation of me or any of the services that I provide to clients.

### **Item 4 Other Business Activities**

Mr. Waller is not involved in any other business activities.

### **Item 5 Additional Compensation**

Mr. Waller does not receive additional compensation from any other source.

### **Item 6 Supervision**

Mr. Waller supervises all investment advisory activity. Mr. Waller conducts periodic reviews of all

WALLER FINANCIAL COACHING, INC.  
Part 2B of Form ADV – Supplemental Brochure

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supervised activities for the Firm. Mr. Waller can be reached at (530) 826-4417.

**Item 7 Requirements for State-Registered Advisers**

Mr. Waller has nothing to report for this item. Mr. Waller had not been the subject of a bankruptcy petition.