

Item 1: Cover Page



FIVEPOINTS
FINANCIAL PLANNING

FivePoints Financial Planning LLC

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Form ADV Part 2A – Firm Brochure

(404) 907-0070

Dated July 6, 2020

This Brochure provides information about the qualifications and business practices of FivePoints Financial Planning LLC, “FFP”. If you have any questions about the contents of this Brochure, please contact us at (404) 907 - 0070. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

FivePoints Financial Planning LLC is registered as an Investment advisor with the State of Georgia. Registration of an Investment advisor does not imply any level of skill or training. Additional information about FFP is available on the SEC’s website at www.advisorinfo.sec.gov, which can be found using the firm’s identification number 307007.

Item 2: Material Changes

Since FFP's last filing on February 6, 2020, the following material changes have been made.

- Updated Item 10: Other Financial Industry Activities and Affiliations and Item 19: Requirements for State-Registered Advisors to describe Andrew Langdon's activities with SmartPath Advisors, LLC
- Updated Item 4: Advisory Business to reflect that FFP is no longer offering the Standard Financial Planning package for Legacy Clients
- Updated Item 4 and Item 16 to reflect that FFP is no longer offering discretionary investment management
- Updated item 5 to reflect FFP will now charge an upfront financial planning fee for all Comprehensive Financial Planning Package clients. We have also updated our minimum Comprehensive Financial Planning Package and Project-Based fees.
- Updated Item 13 to reflect that written reports will no longer be provided with exceptions given based on discretion of FFP. Also, reviews will be conducted periodically throughout the scope of the engagement.
- Updated Item 4 to reflect we no longer have relationships with outside managers or Third-Party Asset Management Platforms (TAMPs)
- Updated Item 4 to reflect the change in the scope of engagement for our Project-based services

Item 3: Table of Contents

Contents

Item 1: Cover Page	1
Item 2: Material Changes	2
Item 3: Table of Contents	3
Item 4: Advisory Business	4
Item 5: Fees and Compensation	9
Item 6: Performance-Based Fees and Side-By-Side Management	12
Item 7: Types of Clients	12
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss	13
Item 9: Disciplinary Information	15
Item 10: Other Financial Industry Activities and Affiliations	15
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	16
Item 12: Brokerage Practices	17
Item 13: Review of Accounts	18
Item 14: Client Referrals and Other Compensation	18
Item 15: Custody	19
Item 16: Investment Discretion	19
Item 17: Voting Client Securities	20
Item 18: Financial Information	20
Item 19: Requirements for State-Registered Advisors	21
Form ADV Part 2B – Brochure Supplement	24

Item 4: Advisory Business

Description of Advisory Firm

FivePoints Financial Planning LLC is registered as an Investment advisor with the State of Georgia. We were founded in August 2019. Andrew Langdon is the principal owner of FFP. Because FFP is a new entity, it currently reports no non-discretionary Assets Under Management. Assets Under Management were calculated as of December 2019.

FivePoints Financial Planning LLC is a fee-only, independent firm that specializes in providing personalized, holistic, and tax-focused financial planning on a retainer model. We agree to restrict our compensation solely and exclusively to the professional fees we receive directly from our clients. We do not accept any sales commissions, referral fees or other forms of compensation from any third parties. We do not have any relationships with any brokerage, insurance, or mutual fund company. We are a fiduciary to our clients and are under an obligation to always act in the client's best interest.

Types of Advisory Services

Comprehensive Financial Planning Package

Our Comprehensive Financial Planning Package includes both investment management services and ongoing comprehensive financial planning. The investment management services and ongoing comprehensive financial planning services are provided together under our Comprehensive Financial Planning Package for a fixed-fee as described in Item 5. Clients may choose to engage in ongoing comprehensive financial planning without receiving investment management services from us; however, the fee for our Comprehensive Financial Planning Package will apply.

Investment Management Services

FFP offers Investment Management Services as part of our Comprehensive Financial Planning Package. We do not require clients to move assets under our management. 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 targets. We will also review and discuss a Client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the Client (e.g., maximum capital appreciation, growth, income, or growth, and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of

securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

Ongoing Comprehensive Financial Planning

FFP offers ongoing comprehensive financial planning services as part of our Comprehensive Financial Planning Package. The client agrees to an ongoing relationship with FFP as their trusted guide in the financial areas of their life. This service involves working one-on-one with a planner over an extended period of time. By paying a fixed monthly or quarterly fee, Clients get to work with a planner who will work with them to develop and implement their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up to date.

During the **Initial Year** there are a number of client-relevant meeting topics to discuss (see list below). Typically, topics are covered via a modular basis, and are planned according to the clients' priorities. If requested, the number of topic discussions can be reduced by combining several topics in a longer discussion. Discussions and meetings can be held face to face or via secure computer link or telephone. Implementation services are provided as needed.

- | | |
|-----------------------------|--------------------------------|
| -Tax Planning | -Estate Planning Review |
| -Budgeting & cash flow | -Investment Selection |
| -Goal Setting | -Small Business Planning |
| -Record-keeping | -Insurance Analysis |
| -Inventory of client assets | -Education Planning |
| -Retirement Planning | -Analysis of Employee Benefits |
| -Portfolio Analysis | -Develop asset allocation |

In **Renewal Years** the number of meeting topics is typically 3-4, and will depend on what is appropriate for the client:

- | | |
|-----------------------------|---------------------------|
| -Tax Planning | -Investment Review/Update |
| -Goal Setting/Review | -Rebalancing of Assets |
| -Education/College Planning | -Insurance Review |

Project-Based Financial Planning Service

We provide stand-alone project-based financial planning services for clients who do not desire ongoing financial planning. Our project-based service consists only in the creation of a comprehensive financial plan. Because we believe we need to understand a client's

complete financial situation in order to provide advice, we do not offer projects that are not comprehensive and only pertain to one area of a client's financial life.

Financial planning involves an 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. Investment recommendations for the project-based service will be limited to asset allocation recommendations. Specific security or sector recommendations are not provided with this service.

Our project-based financial planning services is an engagement that culminates with a written or electronic detailed financial plan that is designed to assist Clients in achieving their stated financial goals and objectives. The length of the engagement can range between 30 and 180 days. This engagement allows for assistance in implementation during the agreed upon length. If after this engagement the client wishes to move forward with our comprehensive financial planning package, a new contract will be signed at that time. In general, the financial plan will address all of the following areas of concern. These areas may include, but are not limited to, the following:

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.

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.

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).

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.

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.

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.

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

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.

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 adversely alter spending during your retirement years.

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 picture, 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”).

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.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our Clients. However, specific Client financial plans and their implementation are dependent upon the Client Investment Policy Statement which outlines each Client’s current situation (income, tax levels, and risk tolerance levels) and is used to construct a Client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients are able to specify, within reason, any limitations they would like to place on discretionary authority as it pertains to individual securities and/or sectors that will be traded in their account, by notating these items on the executed advisory agreement.

Wrap Fee Programs

We do not participate in wrap fee programs.

Item 5: Fees and Compensation

Please note, unless a Client has received the firm's Disclosure Brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the Client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

Comprehensive Financial Planning Package:

Our Comprehensive Financial Planning Package, which includes both investment management and ongoing comprehensive financial planning, consists of an upfront fee of between \$750-\$2,000, followed by an annual fixed-fee, paid either monthly or quarterly. Clients may choose to engage in ongoing comprehensive financial planning without receiving investment management services from us; however, the fee for our Comprehensive Financial Planning Package will apply.

FFP's fees are charged on a fixed fee basis and are based on the scope, size, and complexity of services provided to the client and will vary depending on a number of factors, including but not limited to income, net worth, business interests, and complexity. The minimum annual fee for this service is \$3,000 per year.

The fee is negotiable and may be adjusted depending on increased complexity and/or the Client's specific financial situation. Initial fees are clearly stated in the client agreement and will remain at that agreed upon fee for two years. Following these two years, the fixed-fee will be recalculated and may increase or decrease as income, complexity, and/or net worth increase or decrease. Fee changes will only take effect once the client indicates their acceptance in writing.

Fees are invoiced and may be paid by check or using a mutually agreeable method (EFT, credit card, online platform, etc.). Fees are due monthly or quarterly, in advance. Alternatively, at the discretion of the client, fees may be debited directly from the Clients' account by the custodian upon submission of an invoice to the custodian indicating the account number and amount of fees to be paid. In situations where the client chooses to have fees debited directly from their investment accounts, fees are billed quarterly, in advance, meaning that the firm invoices the client at the beginning of every three-month calendar billing period. The fee is normally deducted from a designated client account directly by the account's custodian upon FFP's instruction. If a client has more than one account, the fee may be pro-rated between the accounts or deducted from individual accounts as determined by FFP to be in the client's best interests. The client must consent in advance to direct debiting/deduction of their account(s) these fees will be paid quarterly, in advance. First quarter fees may be prorated based upon remaining days within the quarter. In no event will FFP collect more than \$500 more than six months in

advance from any client. Any prepaid but unearned fees will be refunded based on the time remaining in the billing period.

Project-Based Financial Planning Service

Project-Based Financial Planning is offered on a fixed fee basis. The fixed fee will be agreed upon before the start of any work. The fixed fee can range between \$1500 and \$10,000, depending on complexity and the needs of the client. The fee is negotiable, with half of the fee due at the beginning of the process and the remainder being due upon completion of work; however, FFP will not bill an amount above \$500.00 more than 6 months in advance. Fees for this service may be paid by electronic funds transfer, credit card, or check. In the event of early termination any prepaid but unearned fees will be refunded to the Client and any completed deliverables of the project will be provided to the Client and no further fees will be charged.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealerships for Client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees and do not engage in side-by-side management.

Item 7: Types of Clients

We provide financial planning, investment management services, and tax planning services to individuals, families & trusts, businesses and estates. Client relationships vary in scope and length of service..

We do not have a minimum account size requirement.

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

Academic research has long shown that the choice of an asset allocation is the single most important factor in determining portfolio results – that is, the reward received for the risk taken. This phenomenon becomes even stronger over time. FFP sees the asset allocation decision as the most critical aspect of investing. With the preponderance and rapid proliferation of investment information, FFP further believes:

- Public capital markets are generally efficiently priced and
- Future market performance is inherently unpredictable.

These beliefs lead us, primarily, to employ passive investment management strategies. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. In contrast, with active management, a manager employs some method, strategy or technique to construct a portfolio intended to generate returns greater than a designated benchmark. Academic research indicates that the vast majority of active managers underperform the market, especially as the investment time horizon lengthens.

To reduce volatility – the commonly accepted definition of risk – given the market's unpredictability, FFP suggests diversification across many dimensions including asset classes, geographies, market capitalization, and, if appropriate, liquidity premiums. We pay particular attention to investment expenses, transaction fees and brokerage commissions the client will incur. Our strategies and investments may have unique and significant tax implications which inform the choice of account type (taxable, tax-deferred, or tax-exempt) for various types of investments. This aspect of investment planning often is termed asset location. As most of our clients are taxable investors, tax efficiency is an important but not the sole consideration in an investment plan.

In summary, FFP typically recommends low-cost, tax efficient mutual funds and ETFs (exchange-traded funds) to build broadly diversified portfolios with asset classes spanning the global equity and fixed income markets.

Our primary method of investment analysis is Fundamental analysis.

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.

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.

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.

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

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 have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such 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 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.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. 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) 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 advisor has no control over the risks taken by the underlying funds in which the Clients invest.

Mutual Funds: When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Item 9: Disciplinary Information

Criminal or Civil Actions

FFP and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

FFP and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

FFP and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of FFP or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

No FFP employee is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No FFP employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

FFP does not have any related parties. As a result, we do not have a relationship with any related parties.

FFP only receives compensation directly from Clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

Andrew Langdon is currently a licensed insurance agent, however, he no longer sells any insurance products, and is not affiliated with any insurance companies. Andrew Langdon will not sell any insurance products to clients or prospective clients of FFP.

In addition, Andrew Langdon is licensed as an investment adviser representative of SmartPath Advisors, LLC, a registered investment adviser. As such, Mr. Langdon, in his separate capacity as an investment adviser representative, is able to provide advisory services apart from FFP, for which he will receive separate and customary compensation. FFP does not refer clients to SmartPath Advisors, LLC and SmartPath Advisors, LLC does not refer clients to FFP. Mr. Langdon endeavors at all times to put the interest of FFP's clients first as part of the firm's fiduciary duty.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and

regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities

Code of Ethics Description

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

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

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its “related persons” may buy or sell securities similar to, or different from, those we recommend to Clients for their accounts. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates’ transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

Trading Securities At/Around the Same Time as Client’s Securities

From time to time, our firm or its “related persons” may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of FFP to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, FFP will never engage in trading that operates to the client’s disadvantage if representatives of FFP buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

FivePoints Financial Planning LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to the Client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

1. Research and Other Soft-Dollar Benefits

We currently do not receive soft dollar benefits.

2. Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for Clients to use, however, Clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing Clients to choose a specific custodian, we may be unable to achieve the most favorable execution of Client transaction and this may cost Clients money over using a lower-cost custodian.

The Custodian and Brokers We Use (TD Ameritrade)

Advisor participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD

Ameritrade is an independent [and unaffiliated] SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance, and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.)

Aggregating (Block) Trading for Multiple Client Accounts

Investment advisors may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. We do not engage in block trading. It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy is to implement all client orders on an individual basis. Therefore, we do not aggregate or “block” client transactions. Considering the types of investments we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

Item 13: Review of Accounts

Andrew Langdon, President and CCO of FFP, will work with Clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. FFP does not provide specific reports to financial planning Clients.

Andrew Langdon conducts reviews and makes recommendations with comprehensive financial planning package clients. These reviews are done periodically throughout the term of the engagement or when requested by the client. Project-based clients do not receive reviews as these services conclude upon the end of the limited engagement.

Other conditions that may trigger a review include, but are not limited to: a large movement in asset markets, price movement of a specific security or group of securities, a change in the client’s financial/life circumstances, delivery of or request for securities or cash, a request from the client for a special review that might be tied to the market, a corporate action for a specific security or overall concern.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements

from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

If you have opened and maintained an investment account on your own or with our assistance, you will receive account statements sent directly from mutual fund companies, transfer agents, custodians or brokerage companies where your investments are held. At FFP's discretion, we may provide annual portfolio statement and position performance summary reports, and annual realized gains/loss reports for taxable accounts. Some of our clients may receive additional reports depending on their specific requirements. All performance reports will be prepared in accordance with the appropriate statute or jurisdictional guidance. Clients are urged to carefully review and compare account statements that they have received directly from their service provider with any report received from our firm.

FFP will not provide written reports to Investment Advisory Clients.

Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

As disclosed under Item 12, above, Advisor participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but

may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the number of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to Clients, Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

Item 15: Custody

FFP does not accept custody of Client funds except in the instance of withdrawing Client fees.

For Client accounts in which FFP directly debits their advisory fee:

- i. FFP will send a copy of its invoice to the custodian at the same time that it sends the Client a copy.
- ii. The custodian will send at least quarterly statements to the Client showing all disbursements for the account, including the amount of the advisory fee.
- iii. The Client will provide written authorization to FFP, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains Client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

Non-Discretionary Trading:

FFP provides non-discretionary investment management. For client's accounts to be managed in a non-discretionary manner, the client's prior approval must be made for each transaction with regard to the investment and reinvestment of account assets or for the firm to give instructions to the service provider maintaining the client's account. Client's may choose to use the custodian

of their choice, with the understanding that by allowing Clients to choose a specific custodian, we may be unable to achieve the most favorable execution of Client transaction and this may cost Clients money over using a lower-cost custodian.

Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

Registered Investment advisors are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to Clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of Client funds or securities or require or solicit prepayment of more than \$500 in fees per Client six months in advance.

Item 19: Requirements for State-Registered Advisors

Andrew Langdon

Born: 1987

Educational Background

- 2013 – Masters of Business Administration, Kennesaw State University
- 2009 – Bachelor of Science In Education, University of Georgia

Business Experience

- 08/2019 – Present, FivePoints Financial Planning LLC, President and CCO
- 06/2020- Present, SmartPath Financial Advisors, LLC, Financial Advisor
- 11/2017 – 01/2020, Stewardship Financial Advisors, Financial Planner & Operations Associate
- 06/2016 – 11/2017, Fujiyama Wealth Management, Associate Advisor
- 01/2016 – 06/2016, Henssler Financial, Financial Planner
- 09/2014 – 12/2015, Ameriprise Financial, Financial Advisor
- 12/2013 – 09/2014, Atlanta Area Council, Boy Scouts of America, District Executive
- 02/2011 –12/2013, Kennesaw State University, Admissions Counselor

Professional Designations, Licensing & Exams

CFP (Certified Financial Planner)®: The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary

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

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

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

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

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

Other Business Activities

In addition, Andrew Langdon is licensed as an investment adviser representative of SmartPath Advisors, LLC, a registered investment adviser. As such, Mr. Langdon, in his separate capacity as an investment adviser representative, is able to provide advisory services apart from FFP, for which he will receive separate and customary compensation. FFP does not refer clients to SmartPath Advisors, LLC and SmartPath Advisors, LLC does not refer clients to FFP. Mr. Langdon endeavors at all times to put the interest of FFP's clients first as part of the firm's fiduciary duty. This activity accounts for approximately 20% of his time

Performance-Based Fees

FFP is not compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at FivePoints Financial Planning LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

FivePoints Financial Planning LLC, nor Andrew Langdon, have any relationship or arrangement with issuers of securities, in addition to what is described in Item 10.

Additional Compensation

Andrew Langdon does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through FFP.

Supervision

Andrew Langdon, as President and Chief Compliance Officer of FFP, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Requirements for State Registered Advisors

Andrew Langdon has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.



FIVEPOINTS
FINANCIAL PLANNING

FivePoints Financial Planning LLC

470 Commerce Drive
Peachtree City, Georgia 30269
<https://fivepointsplanning.com/>

(404) 907 - 0070

Dated February 6th, 2020

Form ADV Part 2B – Brochure Supplement

For

Andrew Langdon 6392975

President and Chief Compliance Officer

This brochure supplement provides information about Andrew Langdon that supplements the FivePoints Financial Planning LLC (“FFP”) brochure. A copy of that brochure precedes this supplement. Please contact Andrew Langdon if the FFP brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Andrew Langdon is available on the SEC’s website at www.advisorinfo.sec.gov which can be found using the identification number 6392975.

Item 2: Educational Background and Business Experience

Andrew Langdon

Born: 1987

Educational Background

- 2013 – Masters of Business Administration, Kennesaw State University
- 2009 – Bachelor of Science in Education, University of Georgia

Business Experience

- 08/2019 – Present, FivePoints Financial Planning LLC, President and CCO
- 06/2020- Present, SmartPath Financial Advisors, LLC, Financial Advisor
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- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients.

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

Item 3: Disciplinary Information

No management person at FivePoints Financial Planning LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

In addition, Andrew Langdon is licensed as an investment adviser representative of SmartPath Advisors, LLC, a registered investment adviser. As such, Mr. Langdon, in his separate capacity as an investment adviser representative, is able to provide advisory services apart from FFP, for which he will receive separate and customary compensation. FFP does not refer clients to SmartPath Advisors, LLC and SmartPath Advisors, LLC does not refer clients to FFP. Mr. Langdon endeavors at all times to put the interest of FFP's clients first as part of the firm's fiduciary duty.

Item 5: Additional Compensation

Andrew Langdon does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through FFP.

Item 6: Supervision

Andrew Langdon, as President and Chief Compliance Officer of FFP, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisors

Andrew Langdon has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

