# **BROCHURE** (Form ADV Part 2A)

## **NetWorth Financial Services, LLC**

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## **Firm Contact**

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## April 21, 2025

This Brochure provides you with information about the qualifications and business practices of NetWorth Financial Services, LLC ("NetWorth Financial Services"). It contains information that you should consider before becoming a client of our firm.

The information contained herein has not been approved or verified by any governmental authority. Our firm is an investment advisory firm registered pursuant to the laws of the State of Georgia. Registration of an Investment Adviser does not imply a certain level of skill or training, only that we have filed the appropriate registration documents in the appropriate jurisdictions and with the respective governmental entities.

If you have any questions about the contents of this Brochure, please contact us by telephone at 678-319-0111. Additional information about NetWorth Financial Services, can be found on the Investment Adviser Public Disclosure website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>. Net Worth Financial Services' CRD/IARD No. is <a href="https://www.adviserinfo.sec.gov">126666</a>.

The Brochure Supplements for the investment advisor representatives of our firm begin after page 13 of this document and this document is not complete without the Brochure Supplements.

## **MATERIAL CHANGES (Item 2)**

## **NetWorth Financial Services Material Changes**

The material changes in this brochure from the last annual updating amendment of NetWorth Financial Services on date are described below. Material changes relate to NetWorth Financial Services' policies, practices or conflicts of interests.

We amended Item 4 of our Brochure to disclose that we manage \$121,815,000 in client assets on a discretionary basis.

We amended Item 5 to replace our previous fee schedule with the following:

Assets Under Management	Maximum Annual Rate
\$-0- to \$249,999	1.50%
\$250,000 to \$499,999	1.40%
\$500,000 to \$749,999	1.25%
\$750,000 to \$999,999	1.10%
\$1,000,000 to \$1,999,999	0.95%
\$2,000,000 to \$2,999,999	0.85%
\$3,000,000 to \$3,999,999	0.75%
\$4,000,000 to \$4,999,999	0.70%
\$5,000,000 to \$5,999,999	0.65%
\$6,000,000 to \$6,999,999	0.60%
\$7,000,000 +	Negotiable

We also added disclosures pertaining to the conflicts of interest associated with the sale of annuity products.

We enhanced disclosures pertaining to methods of analysis, investment strategies, and risk of loss in Item 8.

We amended Item 14 to disclose our occasional receipt of additional compensation from vendors and explained associated conflicts of interest.

#### **Full Brochure is Available**

The foregoing is a summary of the material changes in the annual amendment to our Firm Brochure dated January 13, 2023. If you have any questions, or would like a full copy of our Brochure, please contact us by phone at 678-319-0111 (Office) or by email to reagancurl@networthfs.com.

Additional information about NetWorth Financial Services, can be found on the Investment Adviser Public Disclosure website at <a href="https://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>. NetWorth Financial Services' CRD/IARD No. is 126666.

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## **ADVISORY SERVICES (Item 4)**

#### **About Our Business**

NetWorth Financial Services, LLC ("We," "Our," the "Firm," or "NetWorth Financial") is a wealth management firm that provides financial planning advice and consultations alongside investment/portfolio management strategies. We are a Georgia limited liability company that began managing our clients' investments and providing financial expertise in December of 2001. Mr. Reagan C. Curl is the principal owner and chief compliance officer for the Firm.

## Types of Advisory Services

#### 1. Financial Planning & Consulting Services

We construct financial plans to assist clients in reaching their financial goals. Our plans are developed by evaluating data relative to our client's financial circumstances, investment goals and objectives, and tax status. When implementing our Financial Planning and Consulting Services, we employ a series of data analysis modules to compile information regarding investment planning, retirement income needs, and estate planning. We use the data compiled to make financial recommendations regarding the foregoing. Financial planning is normally included in the portfolio management services discussed below unless there is a specific request for financial planning only. We also provide one-time (or on-going) consultations for modular financial planning matters, and assessment of asset protection and risk management needs.

#### 2. Portfolio Management Services

We offer both discretionary and non-discretionary portfolio management services and personalized asset allocation strategies to meet our client's investment goals and objectives. Financial planning is included in the portfolio management service and is not charged separately unless only financial planning is requested. We provide investment advice regarding stocks, bonds, equities, exchange traded funds, and mutual funds. We do not limit our advice to any specific securities or strategies.

#### **Tailored Services**

Our advice and services are based on individual needs of our clients, after analyzing and thoroughly evaluating our client's goals, objectives, investment horizon, and risk tolerance. Clients may impose restrictions on investing in certain asset classes or any specific types of securities by advising their investment advisor representative of such restrictions in writing.

## Wrap Fee Programs

We are not a sponsor of, or participant in, any Wrap Fee Program(s).

#### Assets under Management

As of January 2025, we manage \$121,815,000 in client assets on a discretionary basis.

## FEES AND COMPENSATION (Item 5)

#### **Advisory Fees**

NetWorth Financial earns its fees and compensation by providing financial planning and investment/portfolio management advice. Our advisory fees for services are as follows:

#### 1. Fees for Financial Planning & Consulting Services

Our fees for standalone financial planning and consulting services will be assessed at a fixed rate of between \$2,500 and \$15,000 depending on time and complexity Upon initial engagement, clients will be provided a fee invoice or in the case of a supplement to other services, advised of fees before additional services are provided.

#### 2. Fees for Portfolio Management Services

Our fee schedule for Portfolio Management Services is as follows:

Assets Under Management	Maximum Annual Rate
\$-0- to \$249,999	1.50%
\$250,000 to \$499,999	1.40%
\$500,000 to \$749,999	1.25%
\$750,000 to \$999,999	1.10%
\$1,000,000 to \$1,999,999	0.95%
\$2,000,000 to \$2,999,999	0.85%
\$3,000,000 to \$3,999,999	0.75%
\$4,000,000 to \$4,999,999	0.70%
\$5,000,000 to \$5,999,999	0.65%
\$6,000,000 to \$6,999,999	0.60%
\$7,000,000 +	Negotiable

#### **Sample Fee Calculation:**

Investments of \$<u>785,000</u> \$785,000 @ 1.10% Annual fee of \$<u>8,635</u> or Quarterly fee of \$<u>2,158.75</u>

Our Portfolio Management fee schedule is negotiable and the final fee is outlined in our Investment Management Agreement.

## Billing Procedures

The Firm bills clients in advance (at the beginning of the billing period) for Portfolio Management Services. It is customary for the Firm to receive written authorization to deduct advisory fees directly from clients' accounts, except as noted herein. With respect to Financial Planning services, clients pay advisory fees by check. Please review the billing procedures below for specific details:

## 1. Billing for Financial Planning Services Billing

Upon engagement for financial planning or consulting services, we will provide a fee invoice for. This fee is generally negotiable. With respect to billing, fifty percent (50%) of the fee is due to the Firm prior to commencing services. The balance is due on the first anniversary of the execution of the Financial Planning agreement or upon conclusion of the consulting session(s). We also provide ongoing financial planning services for a quarterly planning fee. All fees and fee payment arrangements will be clearly set forth in the financial planning agreement signed by the Firm and the client. Invoices will be transmitted to clients, either in person, electronically, or by mail and payment is due upon receipt.

#### 2. Billing for Portfolio Management Services

The fees for portfolio management services are billed and due quarterly in advance. We send the advisory fee calculations electronically, to the account custodian by the beginning of each calendar quarter (i.e., Jan., Apr., July, and Oct.). Fee calculations are based on the value of the account(s) as of the last day of the previous calendar quarter (i.e., Dec., Mar., Jun., and Sept.). Portfolio management fees shall be prorated for each additional contribution made during the applicable calendar quarter. By agreement, client advisory fees are deducted directly from the specified client account(s).

#### Other Fees & Expenses

Clients will also incur additional fees and expenses related to management of investments and advisory service provisions. These fees may include, but are not limited to no-load mutual fund ticket charges, brokerage transaction costs, deferred sales charges on previously purchased mutual funds, IRA maintenance fees and other legal or transfer fees. The broker-dealers, mutual fund companies, and other custodians who provide account services charge these fees ("third party fees") and clients are responsible for payment of all

third party fees and expenses. It is important to note that the advisory fees paid to our firm are separate and distinct from the maintenance fees and transaction expenses charged by these third parties. Please refer to Item 12, Brokerage Practices for more information regarding our account custodians.

## **Refund Policy**

Clients who do not receive this Brochure at least 48 hours in advance of signing our advisory agreement are afforded the right to terminate their agreement within five (5) days, without penalty. Upon expiration of the five (5) day period, either party may terminate the advisory agreement at any time by providing thirty (30) days advance written notice to the other party. Upon receipt of the termination request, we will assess fees pro rata, if applicable, to the date of termination and any unearned portion of prepaid fees will be refunded within fourteen (14) days. Any balances for unpaid fees due to the Firm will be collected prior to disbursement of funds, if applicable. In the event the Firm is unable to deduct final fees from account (in the case of transfer), the Firm will transmit an invoice to client, which is due upon receipt.

## Other Compensation

Our firm's investment advisor representatives are also insurance agents. As insurance agents, our investment advisor representatives may also earn commissions, or other investment product fees for services to clients of our firm.

#### 1. Conflicts of Interest

The aforementioned arrangement for additional compensation creates an actual conflict of interest with our advisory clients because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. To mitigate the conflicts of interest relative to the receipt of commissions, other compensation, and advisory fees, our investment advisor representatives adhere to the following standards: (1) recommendations of products and services are based on an evaluation of the client's best interest (our fiduciary duty) and, (2) clients will receive written notification of compensation or any other actual or potential conflict of interest relative to the purchase or sale of investment products.

#### 2. Non-Exclusive Investment Products

The investment products offered by licensed investment advisor representatives of our firm are also available through other insurance agents insurance brokers not affiliated with NetWorth Financial. As a prospective client or client, you are not obligated to purchase investment products recommended by insurance agents who also represent our firm in an advisory representative capacity.

#### 3. Commissions Revenue

Even though investment advisor representatives earn commission and other sales-based revenue through their insurance agent affiliation, NetWorth Financial receives no commission revenue.

#### 4. Advisory Fee Offset

We do not charge advisory fees with respect to investment products for which an affiliate may receive commission or another sales fee. Therefore, there is no need to offset said sales fee from the advisory fee.

#### 5. Fixed Annuities

Where fixed annuities are sold, clients should also note that the annuity sales result in substantial up-front commissions and ongoing trails based on the annuity's total value. In addition, many annuities contain surrender charges and/or restrictions on access to your funds. Payments and withdrawals can have tax consequences. Optional lifetime income benefit riders are used to calculate lifetime payments only and are not available for cash surrender or in a death benefit unless specified in the annuity contract. In some annuity products, fees can apply when using an income rider. Annuity guarantees are based on the financial strength and claims-paying ability of the issuing insurance company. We urge our clients to read all insurance contract disclosures carefully before making a purchase decision. Rates and returns mentioned on any program presented are subject to change without notice. Insurance products are subject to fees and additional expenses.

## PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT (Item 6)

We do not charge performance-based fees and we do not conduct side-by-side investment product management.

## **TYPES OF CLIENTS (Item 7)**

We generally provide investment advice to individuals, high net-worth individuals, pension and profit sharing plans, charitable organizations, foundations, endowments, trust programs, and other business entities.

Our minimum investment size or value to establish an account is generally \$100,000. Please note that the minimum may be waived based on the anticipation of additional funds to meet minimum accounts value within a reasonable period. The account minimum may also be waived based on other criteria and at the sole discretion of the Firm.

## METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS (Item 8)

## Methods of Analysis and Investment Strategies

NetWorth Financial generally utilizes fundamental analysis methods to analyze investments. Our main sources of information include, but are not limited to, research materials prepared by others, inspection of corporate activities, financial newspapers and magazines, and annual reports, prospectuses, and corporate press releases.

Fundamental analysis is a method of evaluating a company or security by attempting to measure its intrinsic value. In other words, trying to determine a company's or a security's true value by looking at all aspects of the business, including both tangible factors (e.g., machinery buildings, land, etc.) and intangible factors (e.g., patents, trademarks, "brand" names, etc.). Fundamental analysis also involves examining related economic factors (e.g., overall economy and industry conditions, etc.), financial factors (e.g., company debt, interest rates, management salaries and bonuses, etc.), qualitative factors (e.g., management expertise, industry cycles, labor relations, etc.), and quantitative factors (e.g., debt-to-equity and price-to-equity ratios). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of determining what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The investment strategies of our firm consist of strategic asset allocation and asset diversification. Our general recommendations consist of value stocks, exchange traded funds, mutual funds, and fixed income securities for long-term growth and income.

## Material Risks of Methods of Analysis

Furthermore, although we utilize common investment analysis methods and strategies, there remains some level of material risk. We utilize fundamental analysis methods that measure the risks of companies by formulating assumptions based on historical financial representations. Although we use valid data sources, examine expense ratios, review return and risk ratings extensively, refer to economic indicators, review the implications of monetary policy, and consider management team tenure, our strategies are implemented as a result of the assumptions derived from the analysis of historical data. The results of investment strategies derived from this method of analysis are not guaranteed and past performance of investment is not indicative of future financial returns.

## Material Risks of Investment Strategies

## Clients should be aware that investing in securities involves a risk of loss that they should be prepared to bear.

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal. Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines.

There are certain additional risks associated with investing in securities, as described below:

**Recommendation of Particular Types of Securities:** We provide advice on various types of securities and we do not necessarily recommend one particular type of security over another since each client has

different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

**General Investment Risk:** All investments come with the risk of losing money. Investing involves substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments in which you intend to invest.

**Loss of Value:** There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and governmental economic or monetary policies.

**Interest Rate Risk:** Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer-term debt securities are usually more sensitive to interest rate changes.

**Credit Risk:** Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

**Equity (stock) Market Risk:** Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.

**Company Risk:** When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.

**Fixed Income Risk:** When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk. In addition pricing risk if not held to maturity and interest rate move.

**Risks Associated with Investing in Mutual Funds:** Mutual funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. The returns on mutual funds can be reduced by the costs to manage the funds. In addition, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, other types of mutual funds do charge such fees which can also reduce returns.

**Risks Associated with Investing in Exchange Traded Funds (ETF):** Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

**Inverse Funds:** Inverse mutual funds and ETFs, which are sometimes referred to as "short" funds, seek to provide the opposite of the single-day performance of the index or benchmark they track. Inverse funds are often marketed as a way to profit from, or hedge exposure to, downward moving markets. Some inverse

funds also use leverage, such that they seek to achieve a return that is a multiple of the opposite performance of the underlying index or benchmark (i.e., -200%, -300%). In addition to leverage, these funds may also use derivative instruments to accomplish their objectives. As such, inverse funds are highly volatile and provide the potential for significant losses.

**Management Risk**: Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

**Municipal Securities Risk:** The value of municipal obligations can fluctuate over time, and may be affected by adverse political, legislative and tax changes, as well as by financial developments that affect the municipal issuers. Because many municipal obligations are issued to finance similar projects by municipalities (e.g., housing, healthcare, water and sewer projects, etc.), conditions in the sector related to the project can affect the overall municipal market. Payment of municipal obligations may depend on an issuer's general unrestricted revenues, revenue generated by a specific project, the operator of the project, or government appropriation or aid. There is a greater risk if investors can look only to the revenue generated by the project. In addition, municipal bonds generally are traded in the "over-the-counter" market among dealers and other large institutional investors. From time to time, liquidity in the municipal bond market (the ability to buy and sell bonds readily) may be reduced in response to overall economic conditions and credit tightening.

**Alternatives Risk:** Non-traded REITs, business development companies, limited partnerships, and direct alternatives are subject to various risks such as liquidity and property devaluation based on adverse economic and real estate market conditions and may not be suitable for all investors. A prospectus that discloses all risks, fees, and expenses may be obtained from your adviser. Read the prospectus carefully before investing. This is not a solicitation or offering which can only be made in conjunction with a copy of the prospectus. Investors considering an investment strategy utilizing alternative investments should understand that alternative investments are generally considered speculative in nature and may involve a high degree of risk, particularly if concentrating investments in one or few alternative investments.

**Risks Associated with Investing in Private Funds:** Private investment funds are not registered with the Securities and Exchange Commission and may not be registered with any other regulatory authority. Accordingly, they are not subject to certain regulatory restrictions and oversight to which other issuers are subject. There may be little public information available about their investments and performance. Moreover, as sales of shares of private investment companies are generally restricted to certain qualified purchasers, it could be difficult for a client to sell its shares of a private investment company at an advantageous price and time. Since shares of private investment companies are not publicly traded, from time to time it may be difficult to establish a fair value for the client's investment in these companies.

**Illiquid securities:** Illiquid securities involve the risk that investments may not be readily sold at the desired time or price. Securities that are illiquid, that are not publicly traded and/or for which no market is currently available may be difficult to purchase or sell, which may impact the price or timing of a transaction. An inability to sell securities can adversely affect an account's value or prevent an account from taking advantage of other investment opportunities. Lack of liquidity may cause the value of investments to decline and illiquid investments may also be difficult to value. A client may not be able to liquidate investment in the event of an emergency or any other reason.

Certain investment strategies used by our firm may invest in illiquid asset vehicles, such as private equity and real estate. Investment in an illiquid asset vehicle poses similar risks as direct investments in illiquid securities. In addition, investment in an illiquid asset vehicle will be subject to the terms and conditions of the illiquid asset vehicle's investment policy and governing documents, which often include provisions that may involve investor lock-in periods, mandatory capital calls, redemption restrictions, infrequent valuation of assets, etc. In addition, investments in illiquid securities or vehicle may normally involve investment in non-marketable securities where there is limited transparency. If obligated to sell an illiquid security prior to an expected maturity date, particularly with an infrastructure investment, they may not be able to realize fair value. Investments in illiquid securities or vehicles may include restrictions on withdrawal rights and shares may not be freely transferable.

We want you to understand that there are inherent risks associated with investing and depending on the risk occurrence, you may suffer LOSS OF ALL OR PART OF YOUR PRINCIPAL INVESTMENT.

#### **DISCIPLINARY INFORMATION (Item 9)**

Neither our firm nor its management has been involved in legal or disciplinary events related to advisory business.

## OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS (Item 10)

## **Financial Industry Activities**

Neither NetWorth Financial Services nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

## **Financial Industry Affiliations**

Neither our management nor investment advisor representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor nor has applications pending to register as the foregoing or associated persons thereof.

#### Other Affiliations

Our investment advisor representatives are also licensed insurance agents and may offer insurance products and services that include life insurance, disability insurance, long-term care, group life, and fixed annuities. Investment advisor representatives of our firm may devote up to fifty (50%) percent of the workweek to selling insurance products. *Please review Item 4 of each investment advisor representative's Brochure Supplement for information regarding insurance licenses*.

As insurance agents, our investment advisor representatives receive separate, yet customary compensation for insurance product sales. In instances where our investment advisor representatives receive advisory fees in addition to insurance commissions, the compensation will be greater than if purchased separately or absent of the advisory fee component. Insurance products may be available through more cost effective channels, and clients are not obligated to purchase insurance products recommended through investment advisory representatives of our firm.

Acting in dual capacities (insurance agent and investment advisor representative) and receiving compensation in dual capacities, creates conflicts of interest. Accordingly, this is our notification of the aforementioned conflict of interest; additional conflicts will be disclosed in writing prior to providing other services.

As a firm we provide tax preparation services to our clients. This is a conflict of interest as our firm will receive compensation for this service. We always act in the best interest of the client; including the sale of commissionable or fee-based products to advisory clients. Clients are in no way required to purchase any product or service through any representative of our firm in their outside capacities.

Robert J. Ostapower, CPA, CFP owns and operates an accounting firm, North Pointe Tax Services, Inc. This is a conflict of interest as this firm will earn compensation from our clients for the services provided. We always act in the best interest of the client; including the sale of commissionable or fee-based products to advisory clients. Clients are in no way required to purchase any product or service through any representative of our firm in their outside capacities.

#### Other Investment Advisers

NetWorth Financial does recommend or select other investment advisors for its clients.

## CODE OF ETHICS, PARTICIPATION, OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING (Item 11)

#### Code of Ethics

NetWorth Financial, its management, and supervised persons (collectively, "personnel") subscribe to a strict code of ethics. Our Code of Ethics is constructed to comply with the investment advisory laws and regulations that require firms to act as fiduciaries in transactions with their clients. Our inherent fiduciary duty requires that we act solely in our clients' best interest and adhere to standards of utmost integrity in our communications and transactions. These standards ensure that clients' interests are given precedence.

Accordingly, we have implemented extensive policies, guidelines, and procedures that promote ethical conduct and practices by all of our firm's personnel. The foregoing has been compiled and is collectively referred to as our Code of Ethics. We adopted our Code of Ethics to specify and prohibit certain types of transactions deemed to create conflicts of interest (or perceived conflicts of interest), as well as to establish reporting requirements and enforcement procedures relating to personal transactions by our personnel.

Our Code of Ethics, which specifically deals with our fiduciary duty, professional standards, insider trading, personal trading, and gifts and entertainment, establishes our ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. We will provide a copy of our complete Code of Ethics to any client or prospective client upon request.

## Participation or Interest in Client Transactions

We do not recommend that clients buy or sell for their accounts, securities in which a related person may have material financial interest.

## **Personal Trading**

## **Proprietary Trading**

We may at times, buy or sell securities for our own accounts that we have also recommended to clients. We will always document transactions that could be construed as a conflict of interest. To mitigate or remedy conflicts of interest or perceived conflicts of interest, we monitor internal trading reports for adherence to our Code of Ethics.

#### Simultaneous Trading

From time to time, we may buy or sell investments for our own accounts at or around the same time as clients. In any instance where similar securities are purchased or sold, we will uphold our fiduciary duty by always ensuring that transactions are beneficial to the interest of our clients.

## BROKERAGE PRACTICES (Item 12)

#### Selection and Recommendation

We select account custodians after evaluating several factors including but not limited to, fees and expenses, capability to execute, clear, and settle trades, reputation, breadth of investment products made available, access to securities markets and expertise in handling brokerage support processes. We may also select custodians based on dual registrations and other qualifications and/or experience.

Our firm recommends Charles Schwab & Co., Inc. When recommending a custodian, we evaluate the available alternatives to determine which arrangement will provide the most favorable results relative to trading costs, allocation of funds, and rebalancing of client's investments.

Please note that NetWorth Financial is independently owned and operated and not an affiliate of Charles Schwab & Co., Inc.

#### Soft Dollar Benefits

We do receive research or other products or services (i.e., soft dollar benefits) from broker-dealers in exchange for placing trades or processing other securities related transactions for clients. All benefits received are allowable and eligible research or brokerage services under Section 28(e) of the Securities Exchange Act of 1934.

#### 1. Brokerage for Client Referrals

The Firm does not receive client referrals from broker-dealers or other third parties in exchange for using any particular broker-dealer.

#### 2. Directed Brokerage

- (a) As previously stated, based on an evaluation of our client's best interest, we recommend an account custodian that will provide the most favorable results relative to trading cost, efficiency in allocation of funds, and rebalancing of client's investments.
- (b) Due to existing arrangements and certain affiliations, we do not allow clients to direct brokerage.

#### Order Aggregation

In the normal course of business, we may block or aggregate orders for advisory accounts in order to execute transactions in a more timely, equitable, and efficient manner. Our policy is to aggregate client transactions where possible and advantageous to clients. Our policies and procedures also mandate allocating the aggregated orders to the appropriate client accounts in an equitable and expeditious manner after execution. More importantly, the transaction fees charged to each account by the applicable account custodian are not affected by this practice. The Chief Compliance Officer will review transactions periodically to detect and prevent inefficiencies that result from non-compliance with our order aggregation policies and procedures.

## **REVIEW OF ACCOUNTS (Item 13)**

#### Periodic Reviews

Our criteria for reviewing client accounts are as follows:

#### 1. Review of Financial Plans

We prepare financial plans based on the financial data that clients provide to our firm. Financial plans are reviewed according to the schedule outlining the services to be performed and the frequency of those services (i.e., a comprehensive financial plan with annual updates, etc.) by the Associated Person assigned to the client. Clients who receive comprehensive financial planning services will receive a consolidated statement at each review of the financial plan. Please note that clients are responsible for providing updates to the financial information contained in the financial plan and other confidential questionnaires.

#### 2. Review of Portfolio Assets

We review client account portfolios no less than annually or more frequently at the request of any client. Reagan C. Curl and/or the Associated Person assigned to the client reviews the accounts and such reviews consist of on-going monitoring and analysis to determining whether clients' portfolios and strategies continue to align with stated investment goals and objectives. If reallocation of investments is necessary, based on our advisory authority, we may sell underperforming investments or buy new investments that are more appropriate for a client's investment goals and objectives.

#### **Intermittent Review Factors**

Intermittent reviews may be triggered by substantial market fluctuation, economic, business, or political events, or by changes in a client's financial status (such as retirement, termination of employment, relocation, or inheritance). Clients should contact the Firm to initiate an intermittent review upon the occurrence of any of the foregoing events.

## **Client Reports**

Clients will receive transaction confirmations from the account custodian shortly after trading activity (purchases or sells). The account custodian also sends monthly statements for each month in which there is trading activity. If there is no trading activity during any month, clients will receive statements quarterly. In addition, NetWorth Financial generates consolidated performance reports and position reports on an ad hoc basis. These statements will provide details regarding account activity, asset allocations, holdings, and performance. Clients are urged to compare any reports they receive from us with statements generated by the custodian to verify accuracy.

## CLIENT REFERRALS AND OTHER COMPENSATION (Item 14)

## **Economic Benefits for Advisory Services**

Charles Schwab & Co., Inc. provides NetWorth Financial with access to Charles Schwab & Co., Inc. institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Charles Schwab & Co., Inc. Charles Schwab & Co., Inc. includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For NetWorth Financial client accounts maintained in its custody, Charles Schwab & Co., Inc. generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Charles Schwab & Co., Inc. or that settle into Charles Schwab & Co., Inc. accounts.

Charles Schwab & Co., Inc. also makes available to NetWorth Financial other products and services that benefit NetWorth Financial but may not benefit its clients' accounts. These benefits may include national, regional or NetWorth Financial specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Other potential benefits may include occasional business entertainment of personnel of NetWorth Financial by Charles Schwab & Co., Inc. personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist NetWorth Financial in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of NetWorth Financial's fees from its clients' accounts (if applicable), and assist with back-office training and support

functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of NetWorth Financial's accounts. Charles Schwab & Co., Inc. also makes available to NetWorth Financial other services intended to help NetWorth Financial manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Charles Schwab & Co., Inc. may make available, arrange and/or pay vendors for these types of services rendered to NetWorth Financial by independent third parties. Charles Schwab & Co., Inc. may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to NetWorth Financial. NetWorth Financial is independently owned and operated and not affiliated with Charles Schwab & Co., Inc.

Occasionally, our firm and our Associated Persons will receive additional compensation from vendors. Compensation could include such items as gifts; an occasional dinner or ticket to a sporting event; reimbursement in connection with educational meetings with an Associated Person, reimbursement for consulting services, client workshops, or events; or marketing events or advertising initiatives, including services for identifying prospective clients. Receipt of additional economic benefits presents a conflict of interest because our firm and Associated Persons have an incentive to recommend and use vendors based on the additional economic benefits obtained rather than solely on the client's needs. We address this conflict of interest by recommending vendors that we, in good faith, believe are appropriate for the client's particular needs. Clients are under no obligation contractually or otherwise, to use any of the vendors recommended by us.

#### Compensation for Client Referrals

We do not compensate any person who is not a supervised person for client referrals.

## CUSTODY (Item 15)

#### Custodian of Assets

NetWorth Financial does not hold physical custody of client funds or securities. We require that qualified custodians hold client assets. For more information regarding the broker-dealer custodian that services our accounts, please review the Brokerage Practices section (Item 12). Our firm has indirect custody of client funds and securities because of our authorization and ability to deduct advisory fees directly from clients' accounts; nonetheless, we have implemented the safeguard requirements of state regulations by requiring safekeeping of clients' funds and securities by a qualified custodian.

#### **Account Statements**

Client account statements are mailed or sent electronically by the account custodian. Clients are advised to review account statements carefully, comparing asset values, holdings, and advisory fees on current statements to that in previously received statements, confirmations, and fee invoices.

## **INVESTMENT DISCRETION (Item 16)**

#### **Discretionary Authority**

It is customary for our firm to exercise discretionary authority in order to manage and direct the investments of clients' accounts. This authority is granted upon execution of our investment management agreement. Discretionary authority is for the purpose of making and implementing investment decisions without prior consultation with clients. Investment decisions are made in accordance with the client's stated investment objectives and clients may at any time during our engagement, advise us in writing of any limitations on our authority. Clients may impose limitations on investing in securities in specific industries or countries, etc., and dollar amounts or percentage of, investments in the foregoing.

There are some instances where we may exercise non-discretionary authority in managing and directing clients' investments. Under non-discretionary authority, we will seek your consultation and approval (written or oral) prior to implementing investment strategies or decisions. This is not our general practice and this authority is generally only used for clients who have specific types of accounts or receive certain services. (*Please review Item 5, Other Compensation and Item 12, Brokerage Practices for information*)

## VOTING CLIENT SECURITIES (Item 17)

Our firm does not participate in proxy voting on behalf of clients. We may provide information for clarification of the issues presented in proxy solicitation materials; however, our clients are responsible for casting proxy votes. Clients are also responsible for directing shareholder action items relative to mergers, acquisitions, tender offers, bankruptcy proceedings and other type events pertaining to the securities held in accounts managed by us. Clients will receive proxy solicitations and information regarding shareholder action items, by mail or electronically from the account custodian. Clients must follow the instructions for voting or taking action as directed in the mailing or electronic delivery.

## FINANCIAL INFORMATION (Item 18)

## **Balance Sheet Requirement**

NetWorth Financial Services does not require or solicit prepayment of more than \$1,200 in advisory fees per client, six (6) months or more in advance. Moreover, the Firm does not meet any custody requirement that would require submitting its balance sheet.

## Discretionary Authority, Custody of Client Funds or Securities and Financial Condition

We generally exercise discretionary authority, but may also exercise non-discretionary authority with respect to supervising and directing the investments in clients' accounts. Additionally, we have indirect custody of client funds and securities because of our authorization and ability to deduct advisory fees directly from clients' accounts. More importantly, we do not have any financial condition that will impair our ability to meet contractual commitments to clients.

## **Bankruptcy Petition Filings**

NetWorth Financial has not been the subject of a bankruptcy petition at any time during the past ten (10) years.

## REQUIREMENTS FOR STATE REGISTERED ADVISERS (Item 19)

This section is not applicable because our firm is SEC registered.

This Brochure supplement provides information about Investment Advisor Representative, Reagan C. Curl, CRD No. <u>3067955</u> that supplements the firm brochure of NetWorth Financial Services, LLC, IARD No. <u>126666</u>. You should have received a copy of that brochure. Please contact Reagan C. Curl (see contact information below), if you did not receive the NetWorth Financial Services Brochure or if you have any questions about the contents of this supplement.

Additional information about Investment Advisor Representative, Reagan C. Curl, CRD No. <u>3067955</u> can be found on the Investment Adviser Public Disclosure website at <u>www.adviserinfo.sec.gov</u>. This website can be searched by using the investment advisor representative's CRD number (shown above).

## **BROCHURE SUPPLEMENT**

(Form ADV Part 2B)

for

Reagan C. Curl, CRPC®, CMFC®, AIF

## **NetWorth Financial Services, LLC**

11255 Parsons Road, Suite 200 Johns Creek, Georgia 30097

Phone: 678-319-0111
Website: www.networthfs.com
Email: reagancurl@networthfs.com

## **BROCHURE SUPPLEMENT for Reagan C. Curl CRD No. 3067955**

## EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE (Item 2)

## NetWorth Financial Services Requirements for Representative Employment

We require that employees who provide advice on behalf of the firm have at least, a 4-year college degree, 2 years relevant work experience in the securities industry. Prospective employees must also have taken and passed the appropriate state advisory exam(s).

## Investment Advisor Representative's Information Reagan C. Curl Year of Birth: 1970

## **Educational Background**

Bachelor of Science in Finance, Auburn University, Auburn, Alabama, 1994

#### **Exams & Licenses**

- ❖ Life Insurance License, 5/1996
- ❖ Health Insurance License, 10/2010

**Series** 65, 3/2010

## **Professional Designations**

#### AIF® - Accredited Investment Fiduciary®, 2017

The AIF designation, awarded by the Center for Fiduciary Studies, an fi360 company, demonstrates the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence.

AIF designees must complete 6 steps to earn the designation: 1. submit registration and fee; 2. successfully complete a specialized program on investment fiduciary standards of care; 3. pass a comprehensive examination; 4. upon passing, submit the accreditation application and fee; 5. complete annual continuing educational requirements; 6. pledge to abide by the designation's code of ethics.

### Chartered Retirement Planning Counselor (CRPC), 2009

Reagan Curl has earned the Chartered Retirement Planning Counselor (CRPC) professional designation. The CRPC is offered by The College for Financial Planning®. The CRPC Program focuses on the pre and post-retirement needs of individuals. Enrollment in the program guides you through the retirement process, addressing issues such as estate planning and asset management. The College for Financial Planning® awards the Chartered Retirement Planning Counselor<sup>SM</sup> and CRPC® designation to students who: successfully complete the program; pass the final examination; and comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct promulgated by The College for Financial Planning®.

Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed. Successful students receive a certificate and are granted the right to use the designation on correspondence and business cards for a two-year period.

Continued use of the CRPC® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the CRPC® designation by: completing 16 hours of

continuing education and reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self-disclosure of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct.

## Chartered Mutual Fund Counselor (CMFC), 2008

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

The College for Financial Planning® awards the Chartered Mutual Fund Counselors and CMFC® designation to students who successfully complete the program; pass the final examination and comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed. Continued use of the CMFC® designation is subject to ongoing renewal requirements.

Every two years individuals must renew their right to continue using the CMFC® designation by completing 16 hours of continuing education and reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct.

## **Business Experience**

Owner, Investment Advisor Representative President, CEO & Chief Compliance Officer NetWorth Financial Services, LLC Johns Creek, Georgia	2016 – Present
Owner Johns Creek Wealth Management Johns Creek, Georgia	2010 – 2016
Financial Advisor/Registered Representative LPL Financial, LLC Johns Creek, Georgia (Branch Office)	2010 – 2019
Investment Advisor Representative IFG Advisory, LLC d/b/a Johns Creek Wealth Management Johns Creek, Georgia (Branch Office)	2014 – 2016
Regional Sales Director Altin Holdings	2009 – 2010
Regional Sales Director Mass Mutual	2007 – 2009

## **DISCIPLINARY INFORMATION (Item 3)**

Criminal or Civil Actions.

None.

Administrative Actions or Proceedings.

None.

Self-Regulatory Organization (SRO) Proceedings. None.

Professional Standards Violations.
None.

## OTHER BUSINESS ACTIVITIES (Item 4)

#### **Investment Related**

Mr. Curl is a licensed insurance agent. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. NetWorth Financial Services always acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any representative of NetWorth Financial Services in such individual's outside capacities.

## **ADDITIONAL COMPENSATION (Item 5)**

Mr. Curl earns additional compensation as a result of his dual financial industry activities. (*Please see Item 5 - Other Compensation and Item 10 - Financial Industry Affiliations of our Brochure for additional details*)

## **SUPERVISION (Item 6)**

Mr. Curl is also the Chief Compliance Officer of the Firm. He is responsible for providing advice to clients and administration of the firm's operations. The Firm administers supervision through application of its written supervisory policies and procedures

The firm has implemented a Code of Ethics and an internal compliance program that guides the firm and its personnel in complying with applicable state and federal securities laws and in meeting their fiduciary obligations to clients. Clients may contact Mr. Curl at 678-319-0111 or at <a href="mailto:reagancurl@networthfs.com">reagancurl@networthfs.com</a> to obtain a copy of our firm's code of ethics.

Additionally, our firm is subject to regulatory oversight by various agencies. These agencies require registration by our firm and its investment adviser representatives. As a registered entity, our firm is subject to examinations by regulators, which may be announced or unannounced. We are also required to periodically update the information provided to these agencies and to provide various reports regarding firm business.

## REQUIREMENTS FOR STATE REGISTERED ADVISERS (Item 7)

This section is not applicable because our firm is SEC registered.

This Brochure supplement provides information about Investment Advisor Representative, Robert J. Ostapower, CRD No.4581235 that supplements the firm brochure of NetWorth Financial Services, LLC (CRD/IARD No. 126666). You should have received a copy of that brochure. Please contact Reagan C. Curl (see contact information below), if you did not receive the NetWorth Financial Services Brochure or if you have any questions about the contents of this supplement.

Additional information about Investment Advisor Representative, Robert J. Ostapower, CRD No. <u>4581235</u> can be found on the Investment Adviser Public Disclosure website at <u>www.adviserinfo.sec.gov</u>. This website can be searched by using the investment advisor representative's CRD number (shown above).

## **BROCHURE SUPPLEMENT**

(Form ADV Part 2B)

## for

Robert J. Ostapower, CPA, CFP®

## **NetWorth Financial Services, LLC**

11255 Parsons Road, Suite 200 Johns Creek, Georgia 30097

Phone: 678-319-0111 Email: robertostapower@networthfs.com Website: www.networthfs.com

## **Supervisory Contact**

Reagan C. Curl, Chief Compliance Officer Email: <a href="mailto:reagancurl@networthfs.com">reagancurl@networthfs.com</a>

Phone: 678-319-0111

## BROCHURE SUPPLEMENT for Robert J. Ostapower CRD No. 4581235

#### EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE (Item 2)

## NetWorth Financial Services Requirements for Representative Employment

We require that employees who provide advice on behalf of the firm have at least, a 4-year college degree, 2 years relevant work experience in the securities industry. Prospective employees must also have taken and passed the appropriate state advisory exam(s).

## Investment Advisor Representative's Information Robert J. Ostapower, CFP® Year of Birth: 1962

## **Educational Background**

Bachelor of Business Administration in Accounting, University of Georgia, Athens, Georgia, 1985 Master of Business Administration in Finance, Georgia State University, Atlanta, Georgia, 1991

#### **Exams & Licenses**

❖ Health Insurance License, 10/2002

- ❖ Series 65, 8/2004
- ❖ Variable Insurance Products License, 10/2002

## **Professional Designations**

## CPA - Certified Public Accountant

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination.

In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

#### Certified Financial Planner (CFP), 2006

Bob earned the Certified Financial Planner (CFP) designation in 2006. 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 62,000 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, 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 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 ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks.

## **Business Experience**

Investment Advisor Representative 2016 - Present NetWorth Financial Services, LLC Johns Creek, Georgia Registered Sales Assistant 2012 - 2019 LPL Financial, LLC Johns Creek, Georgia (Branch Office) Georgia Insurance Agent 2009 - 2018 Key Planning, Atlanta, Georgia President, Tax Preparer & Accounting Services 2004 - Present Northpoint Tax Services, Alpharetta, Georgia Registered Representative 2008 - 2012 Questar Capital Corporation, Atlanta, Georgia

## **DISCIPLINARY INFORMATION (Item 3)**

Criminal or Civil Actions.

None.

Administrative Actions or Proceedings.

None.

Self-Regulatory Organization (SRO) Proceedings.

Professional Standards Violations.

None.

## OTHER BUSINESS ACTIVITIES (Item 4)

#### Investment Related

Mr. Ostapower is a licensed insurance agent. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. NetWorth Financial Services always acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any representative of NetWorth Financial Services in such individual's outside capacities.

#### Non-Investment Related

Mr. Ostapower owns and operates an accounting firm, North Pointe tax Services, Inc. This is a conflict of interest as this firm will earn compensation from our clients for the services provided. We always act in the best interest of the client; including the sale of commissionable or fee based products to advisory clients. Clients are in no way required to purchase any product or service through any representative of our firm in their outside capacities.

## ADDITIONAL COMPENSATION (Item 5)

Mr. Ostapower earns additional compensation as a result of his dual financial industry (*Please see Item 5 - Other Compensation and Item 10 - Financial Industry Affiliations of our Brochure for additional details*)

## **SUPERVISION (Item 6)**

Reagan C. Curl, the firm's chief compliance officer supervises Bob Ostapower. The firm has implemented a Code of Ethics and an internal compliance program that guides the firm and its personnel in complying with applicable state and federal securities laws and in meeting their fiduciary obligations to clients. Clients may contact Mr. Curl at 678-319-0111 or at <a href="mailto:reagancurl@networthfs.com">reagancurl@networthfs.com</a> to obtain a copy of our firm's code of ethics.

Additionally, our firm is subject to regulatory oversight by various agencies. These agencies require registration by our firm and its investment adviser representatives. As a registered entity, our firm is subject to examinations by regulators, which may be announced or unannounced. We are also required to periodically update the information provided to these agencies and to provide various reports regarding firm business.

## REQUIREMENTS FOR STATE REGISTERED ADVISERS (Item 7)

This section is not applicable because our firm is SEC registered.