

Part 2A of Form ADV: *Firm Brochure*

Financial Directions LLC

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12/31/2019

This brochure provides information about the qualifications and business practices of Financial Directions LLC. If you have any questions about the contents of this brochure, please contact the Chief Compliance Officer at 520-408-7777 or mary@financialdirectionsllc.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Registration with the SEC or with any state securities authority does not imply a certain level of skill or training.

Additional information about Financial Directions LLC also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 108475.

Item 2 Material Changes

The SEC adopted "Amendments to Form ADV" in July, 2010 which mandated this document to be in a narrative form and include some information we were not previously required to disclose. The following Firm Brochure, dated 12/31/2019, is our current disclosure document prepared according to SEC requirements and rules.

Item 2 is specifically intended to provide you with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

Consistent with these new rules, we will provide a notice of summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. Furthermore, we will notify you of other interim disclosures about material changes as necessary.

As of this filing of our annual updating amendment and Firm Brochure dated 12/31/2019 we have no material changes to report. You may review our current Brochure as filed with the SEC on our website www.financialdirectionsllc.com. Or contact us at 520-408-7777 for a printed copy of our current or archived Brochures.

Item 3 Table of 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	6
Item 6	Performance-Based Fees and Side-By-Side Management	8
Item 7	Types of Clients	8
Item 10	Other Financial Industry Activities and Affiliations	11
Item 12	Brokerage Practices	13
Item 13	Review of Accounts	15
Item 14	Client Referrals and Other Compensation	15
Item 15	Custody	15
Item 16	Investment Discretion	16
Item 17	Voting Client Securities	16
Item 18	Financial Information	16

Item 4 Advisory Business

Financial Directions LLC is a SEC Registered Investment Adviser (RIA) with its principal place of business located in Tucson, Arizona. Financial Directions LLC began conducting business in 1996.

Listed below are the firm's principal owners (i.e., those individuals controlling 25% or more of this company).

- Stan W Spackeen, Managing Member
- Frank B Griffith, Member

Financial Directions LLC offers the following advisory services to our clients:

INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT

Our firm provides on-going advice to you regarding the investments in any accounts you have placed under our supervision through an Investment Advisory Agreement. Together, through personal discussions of your individual situation, we create and manage a portfolio based on that information. During the data-gathering process, we will discuss such things as your individual objectives and goals, time horizons, risk tolerance, liquidity needs, prior investment history, family composition, or other pertinent information.

We endeavor at all times to put your interests first as part of our fiduciary duty as a Registered Investment Advisor.

We manage these advisory accounts on a discretionary basis. Account supervision is guided by your objectives and strategies as discussed (i.e., capital appreciation, capital conservation, income, limit risk, or a combination), as well as tax considerations. To ascertain if the initial determination of an appropriate portfolio remains suitable and that the account continues to be managed in a manner consistent with your financial circumstances, our relationship covers:

1. We will periodically contact you to determine whether there have been any changes in your financial situation or investment objectives;
2. We will be reasonably available for consultations;
3. We will maintain client suitability information in your file based on information you have provided;
4. You will contact us when there are changes in your circumstances, or with concerns or questions about your investments; and
5. You will inform us of reasonable restrictions you have on investing in certain securities, types of securities or industry sectors;
6. You will inform us of specific areas of interest or expertise.

Our investment recommendations are not directed to any specific or proprietary product or service offered by a broker-dealer, insurance company, or securities firm (see Item 12 Best Execution). We will generally include advice regarding the following types of securities:

- Exchange-listed securities

- Securities traded over-the-counter
- Foreign issues (such as ADRs or foreign currency CDs)
- Corporate debt securities (other than commercial paper)
- Certificates of deposit
- Municipal securities
- Variable annuities
- Mutual fund shares and/or Exchange-traded Funds
- United States governmental securities
- Interests in partnerships investing in real estate
- Interests in partnerships investing in oil and gas interests
- Interests in partnerships investing in other alternatives, including equipment leasing programs, commodities trading, and timber.

While some types of securities, such as alternatives or individual issues, may be intended to limit overall portfolio volatility or provide additional growth potential they also involve additional risk and are usually illiquid, non-traded, or traded on a secondary market. Therefore, they may be implemented/recommended when consistent with your investment objectives. Reg D or private offerings can only be offered to qualified or accredited investors as designated in the subscription documents. Due diligence of the initial suitability of a company's offerings is screened through Triad Advisors. After initial suitability screening it is incumbent on you and your advisor to review specific qualifications and risks prior to investing.

In addition to individual advisory accounts our firm has established a retirement trust entitled the Financial Directions LLC Retirement Savings Trust 403(b). The Trust is a platform of no-load or load waived mutual funds and model asset allocation portfolios (outlined below) selected and monitored by Financial Directions. The custodian was changed in 2019 from TD Ameritrade to Matrix Financial and the current recordkeeper is Professional Capital Services (PCS). These service providers can be changed at the discretion of Financial Directions. Currently no new contributions are approved to flow to the platform.

The platform we created is a selection of mutual funds and model portfolios designed to meet particular investment goals. We manage the models on a discretionary basis per the model's objectives rather than your individual needs. Through personal discussions with you we determine if individual mutual funds or one of the model portfolios is suitable to your circumstances. Account supervision is guided by your objectives (i.e. capital appreciation, capital preservation, income, or a combination), as well as tax considerations.

Principal Conservation Model Portfolio: designed for risk averse participants who want bond and cash equivalent investments to limit downside market volatility.

Conservative Balanced Model Portfolio: designed for risk averse participants who want a mix of stocks and bonds to provide some growth potential while limiting downside market volatility.

Growth Model Portfolio: designed for participants focused on long-term growth potential with a mainly equity portfolio.

Aggressive Growth Model Portfolio: designed for aggressive long-term growth through an equity portfolio with a mix of domestic and international stocks.

AMOUNT OF MANAGED ASSETS

As of 12/31/2019, we were actively managing \$411,637,062 of client assets on a discretionary basis of which \$407,274,729 is custodied through Fidelity Investments and \$4,362,333 is custodied through TD Ameritrade for the Financial Directions Retirement Savings Trust 403(b).

Item 5 Fees and Compensation

INVESTMENT SUPERVISORY SERVICES INDIVIDUAL PORTFOLIO MANAGEMENT FEES

The annualized fee for Investment Supervisory Services is primarily a percentage of assets under management (AUM), but retainer and hourly fees can also be negotiated.

Services charged as a percentage of assets under management are generally according to the following schedule:

<u>Assets Under Management</u>	<u>Our Typical Fee</u>
\$0 - 500,000	1.00%
\$500,001 - 1,000,000	.7-1.00%
\$1,000,000+	Negotiable

Services billed under a retainer are generally according to the following schedule:

<u>Assets Under Retainer</u>	<u>Our Typical Fee</u>
\$0 - 150,000	\$100 \$1500 per year
\$150,001 - 1,000,000	\$1500 \$10,000 per year
\$1,000,000 - 3,000,000	\$10,000 \$15,000 per year
>\$3,000,000	\$15,000 - Negotiable per year
>\$5,000,000 year	Negotiable per

Retainer fees are generally based on account aggregation, asset levels, and advisor service time required.

AUM fees are billed quarterly in advance, and are calculated based on the fair market value of the account on the last day of the quarter, or as of the last Friday of the quarter if the quarter ends on a weekend or holiday. One-fourth of the annual retainer amount is deducted on a quarterly basis beginning with the next regular quarterly billing cycle.

Quarterly fees as calculated above are directly debited from your account in accordance with your authorization in the Investment Advisory Agreement. Notification of fee debit is provided to you in your account statement. In the event the account does not contain a sufficient cash balance to cover the fee we can at our discretion liquidate sufficient investment shares held in the account to cover the fee, or adjust the fee accordingly. Initial or additional funds or transfers into the account during the quarter do not incur fees until the next regular quarterly billing cycle. (See Termination below.) If fees are invoiced to you directly you agree to pay the invoice timely as outlined in the Investment Advisory Agreement.

Fee debits are reviewed by our advisors during the regular billing cycle and audited quarterly by management by examining a random selection of accounts for accuracy. Any errors noted will be a) adjusted on the next regular billing cycle if the fee was in excess of the correct calculation, b) accepted in full payment as deducted if the fee was less than the correct calculation, or c) a refund check will be issued to the client.

In addition to our advisory fee, accounts in the Financial Directions LLC Retirement Savings Trust 403(b) may be charged administrative and custodial fees on a quarterly basis. Administrative and custodial fees are currently paid by Financial Directions or are offset against any fees recouped from mutual fund investments. An administrative fee may be assessed on accounts under a pre-determined minimum account value at the quarter ending date.

Limited Negotiability of Advisory Fees: Although we have established the aforementioned fee schedule (Item 5), we may adjust the stated fee range, percent or amount on a client-by-client basis. The specific fee is identified in the Investment Advisory Agreement signed between you and your advisor, but it is never higher than what is stated in our ADV.

GENERAL INFORMATION

Termination of the Advisory Relationship: An agreement for investment supervisory services may be canceled at any time, by either party, for any reason upon written notice. As disclosed in Item 5 above, certain fees are paid in advance of services provided. If a termination notice is received from you before fees are deducted for the quarter then no fee will be charged. If your termination notice is received after fees are deducted for the quarter then the termination notice should contain a request for refund of fees paid. A pro-rated amount may be calculated based on the date the termination notice is received at our office and the number of days until the end of the quarter. If a full refund is requested this will be taken under consideration of the circumstances prompting the termination and the number of days until the end of the quarter. If full, partial, or periodic distributions are made during the quarter no fee adjustment is made. Depending on the custodian holding your assets, your account may be charged a termination fee. Typical fees range from \$35 to \$150 and are usually deducted from your account at distribution.

Mutual Fund Fees: All fees paid to us for investment supervisory services as agreed to in the Investment Advisory Agreement are separate and distinct from the fees and expenses charged by mutual funds, ETFs, or other investment products to their shareholders. These investment product expenses are described in each fund's prospectus. These expenses will generally include a management fee, other fund expenses, and transfer or distribution fees. You can invest in a mutual fund directly through our relationship with Triad Advisors (see Item

5) and without investment supervisory services, but you are still subject to the fees and expenses charged by the investment company. Accordingly, you should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid and to thereby evaluate the advisory services we are providing. Some mutual fund shares charge 12(b)1 fees but we do not participate in this revenue.

Additional Fees and Expenses: In addition to our advisory fees and fund expenses, you are also responsible for the fees and expenses charged by custodians or broker dealers for account services whether transactions are initiated by you or your advisor. These fees and expenses will generally include, but are not limited to, transaction charges, termination fees, trading costs, margin calls, and annual fees. Please refer to the Brokerage Practices section (Item 12) for additional information.

Grandfathering of Account Requirements: You are subject to the terms and fee schedule in effect per the most current Investment Advisory Agreement signed and on file. You and your advisor may re-negotiate or update the advisory agreement from time to time. The new agreement must be signed by you before it becomes effective.

DOL Accounts and Fiduciary Status: Accounts under the Department of Labor (DOL) jurisdiction include Employee Retirement Income and Securities Act (ERISA) employee benefit plans and IRAs. As a Registered Investment Advisor (RIA) we have always been considered a fiduciary to these clients or accounts. Our ADV and Investment Advisory Agreements disclose our fiduciary status, how we are compensated, or any conflicts of interest. We will disclose your options, including associated fees and expenses, when recommending a rollover from your employer plan or from a commission based account to an account under an Investment Advisory Agreement.

Advisory Fees in General: You should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisors for similar or lower fees. We feel we have structured our range of fees to be competitive and reasonable for the services we provide.

Registered Representatives: Some of our advisors are also dually licensed as registered representatives of Triad Advisors, a broker-dealer, and/or licensed as insurance agents. This affiliation enables your advisor to implement investment and insurance opportunities for you not available through our Investment Supervisory Services. For business as a registered representative your advisor is separately compensated via commissions and 12b-1 fees. These fees are not negotiable. Business contracted as a registered representative is separate from Investment Supervisory Services (see Item 4) and must be disclosed at or before an account is established.

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

Financial Directions LLC does not charge performance-based fees.

Item 7 Types of Clients

Financial Directions LLC provides investment supervisory services to the following types of clients:

- Individuals (other than high net worth individuals) 58% of accounts

- High net worth individuals (an individual with more than \$1,000,000 under management)
42% of accounts

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

METHODS OF ANALYSIS

We use the following methods of analysis in formulating our investment advice and/or managing assets:

Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis. We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

Cyclical Analysis. In this type of technical analysis, we measure the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.

Asset Allocation. This is a strategy to help reduce risk and maximize returns on an investment portfolio. Rather than focusing primarily on securities selection, we attempt to identify an appropriate mix of asset classes, including securities, alternative investments, fixed income, and/or cash, suitable to your circumstances. These depend on many factors, such as your investment goals, how much time you have to invest, your risk tolerance, interest rates, and market outlook.

A risk of asset allocation is that you may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements. Together we should review and rebalance your portfolio from time to time to remain in tune with your circumstances.

Mutual Fund and/or ETF Analysis. We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in your portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for your portfolio.

Risks for all forms of analysis. Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

We use the following strategies in managing accounts, provided that such strategies are appropriate to your needs and consistent with your investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term purchases. We purchase securities with the idea of holding them in your account for a year or longer. Typically we employ this strategy when:

- we believe the securities to be currently undervalued, and/or
- we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Short-term purchases. When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

Margin transactions. If an account is setup with margin privileges you can purchase stocks for your portfolio with money borrowed from your brokerage account. This allows you to purchase more stock than you would be able to with your available cash, and allows you to purchase stock without selling other holdings. A risk with this strategy is you may be subject to a margin call if the security has a decline in value. Margin accounts are not recommended but this trading privilege can be established with your written request.

Risk of Loss. Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to your, or a prospective client's, evaluation of our advisory business or the integrity of our advisors.

Our firm and advisors have no reportable disciplinary events to disclose. Broker history is available for public viewing on the SEC (www.sec.gov) and FINRA (www.finra.org) websites.

Item 10 Other Financial Industry Activities and Affiliations

Some of our advisors are dually licensed as registered representatives of Triad Advisors, a broker-dealer. These individuals, in this separate capacity, can effect securities transactions through Triad for which they will receive separate, but customary, compensation (see Item 5).

We endeavor at all times to put your interests first as part of our fiduciary duty as a Registered Investment Adviser. You should be aware that the differing structures of compensation may create a conflict of interest and may affect the decisions of your advisor when making recommendations.

. We take the following steps to address this conflict:

- we disclose to you the existence of all material conflicts of interest, including the potential for your advisor to earn separate compensation from certain investments in addition to advisory fees;
- we disclose to you that you are not obligated to purchase recommended investment products from your advisor;
- we make a reasonable effort to collect, maintain and document accurate, complete and relevant client background information, including your financial goals, objectives and risk tolerance;
- our management conducts regular reviews of random client accounts and all new accounts to verify that recommendations made are suitable to your needs and circumstances;
- we require that our advisors seek prior approval of any outside employment activity so that we may ensure that any conflicts of interest in such activities are properly addressed;
- we periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- we educate our advisors regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to you.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our personnel to be in compliance with applicable federal securities laws. We require our personnel to sign an acknowledgment of the Code of Ethics annually.

We owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere to both specific provisions of the Code of Ethics and the general underlying principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of securities transactions as well as initial and annual securities holdings reports that must be submitted by our personnel. Among other things, our Code of Ethics also requires the prior approval of any

acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Our Code of Ethics further includes the firm's privacy policy prohibiting the use of material non-public information. All personnel are reminded that such information may not be used in a personal or professional capacity. We do not publicly publish, distribute, or market non-public identifiable information.

Copies of our Code of Ethics and annual privacy notice are available to the public on our website www.financialdirectionsllc.com or upon request.

Financial Directions LLC and our personnel are prohibited from engaging in principal transactions, in agency cross transactions, and from accepting on behalf of a client any funds, checks, or securities that are made payable or endorsed to our firm or personnel. We do not cash or custody funds at any time. We make a good faith attempt to forward all such documents within 24 hours to the appropriate investment company.

Personal Trading Activity

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our personnel will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing personnel to invest for their own accounts.

Individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to you.

None of our personnel may knowingly purchase or sell any security prior to a transaction being implemented for an advisory account, thereby preventing such personnel from benefiting from transactions placed on behalf of advisory accounts.

Conflicts of Interest

As these situations represent actual or potential conflicts of interest to you, we have established the following policies and procedures for implementing our Code of Ethics, to ensure we comply with our regulatory obligations and provide you and potential clients with full and fair disclosure of such conflicts of interest:

1. No personnel of our firm may put his or her own interest above the interest of an advisory client.
2. No personnel of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her affiliation unless the information is also available to the investing public.
3. No personnel may purchase or sell any security prior to a transaction being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.
4. Our firm requires prior approval for any IPO or private placement investments by personnel of the firm.
5. We maintain a report of securities holdings for our firm and personnel. These holdings are reported annually by our personnel and reviewed on a regular basis by our firm's management.

6. We have established procedures for the maintenance of all required books and records.
7. You should be fully informed if your advisor acting as a registered representative will receive a separate commission when effecting transactions during the implementation process (see Item 5).
8. You can decline to implement any advice rendered. On accounts where we are granted discretionary authority, you may impose reasonable restrictions on investing in certain types of securities, or industry sectors. Such restrictions must be in writing.
9. All of our personnel must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
10. We require acknowledgement of the Code of Ethics by all personnel of our firm annually.
11. We have established policies requiring the reporting of Code of Ethics violations to our management.
12. Any individual who violates any of the above restrictions may be subject to termination.

As disclosed in preceding sections of this Brochure (see Item 5 and Item 10), some advisors are dually licensed as Registered Representatives of a broker-dealer. Please refer to Item 5 for a detailed explanation of these relationships and important conflict of interest disclosures.

Item 12 Brokerage Practices

You give us discretionary authority when you sign the Investment Advisory Agreement with your advisor, and you may limit this authority by giving us written instructions. You may also change or amend such authority by providing us with updated written instructions.

Soft Dollars

Definition: arrangements under which products or services other than execution of securities transactions are obtained by an advisor from or through a broker-dealer in exchange for the direction by the advisor of client brokerage transactions to the broker-dealer. A firm must exercise investment discretion over an account in order to use client commissions to obtain research.

We do NOT participate in soft dollar arrangements.

Block Trading

As a matter of policy and practice, we do not generally place block trades and, therefore, we implement client transactions separately for each account. Consequently, certain client trades may be executed before others at different prices. An exception to this policy is when we rebalance the asset allocation model portfolios. These trades are initiated with block trades for the affected accounts.

We have an arrangement with National Financial Services LLC (a division of Fidelity) and Fidelity Institutional Wealth Services (Fidelity) through which Fidelity provides us with their institutional platform of services. These services include brokerage, custody, and other related services. We have the discretion to change this arrangement at any time when we determine it to be in the overall best interests of our clients.

Fidelity also offers other services intended to help us manage and further develop our advisory practice. Such services include, but are not limited to, performance reporting,

financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom we may contract directly.

Best Execution

As a result of receiving such services and benefits, we may have an incentive to continue to use or expand the use of Fidelity's services. We examined this potential conflict of interest when we chose to enter into the relationship with Fidelity and have determined that the relationship is in the best interests of our clients and satisfies our client obligations, including our duty to seek best execution. A client may pay a trading or transaction fee that is higher than another qualified or discount broker might charge to effect the same transaction. We determine in good faith that the charges are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, while we seek competitive rates, to the benefit of all clients, we may not actually obtain the lowest possible rates for specific client account transactions. Generally, we use the investment research products and services to service all clients.

Trade Errors

Each advisor may place his own trades or provide trading instructions to management. In either case trades are reviewed by management daily. The accuracy of trades placed in advisory accounts is reviewed per the daily trade report. If an error or suspicious activity is detected we contact the custodian's trading desk immediately. Trading error corrections are sent electronically to Fidelity and needed adjustments are monitored until a report confirming correction is received. A copy of the corrections report is kept on file in the Trade Error Blotter. Any gain or loss resulting from the correction is posted to our Fidelity trade correction account and may be journaled to the affected account. Typically gains are transferred to affected account(s) and losses are backcharged to the advisor.

Financial Directions LLC and Fidelity are not affiliated. Financial Directions LLC and Triad Advisors are not affiliated. For our investment supervisory service business we are independently registered with the SEC as a Registered Investment Advisor. Our purpose is to provide competitive services through resources and relationships designed to support the best interests of you and your investments. (See Item 5.)

Share Class Selection

Share class selection has been a hot topic under regulatory review. We periodically review our holdings and initiate share class conversions when deemed appropriate. Our review covers annual expenses, 12-b1 fees, transaction fees, amounts invested, and holding times. In light of these reviews we have implemented guidelines to ensure an appropriate share class selection is utilized to your best interest. As a general rule a mutual fund purchase greater than \$20,000 should be purchased as an institutional share class when available even if there is a transaction fee. We have determined this is a breakeven purchase point assuming \$25 transaction fees if the fund expense is 20bps less and a 12 month holding period. Exceptions to this would be if you plan or want the ability to add to or sell the position within a shorter timeframe.

The use of funds with an associated 12b-1 fee may be used or held on transfer-in if the net fee and load-waived features are determined to be in your best interest. We do not receive revenue from the 12b-1 fees.

Undoubtedly there are exceptions to these guidelines and it is both the Advisor's and your responsibility to determine which share class is the most prudent based on the information at the time of purchase or transfer-in, the expected timeframe to hold the position, and the fund fee differential.

Item 13 Review of Accounts

INVESTMENT SUPERVISORY SERVICES INDIVIDUAL PORTFOLIO MANAGEMENT

Reviews: While the underlying securities within accounts are continually monitored, individual accounts are reviewed on a random basis at least monthly. Accounts are reviewed in the context of your stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as your individual circumstances, the market, political or economic environment.

These accounts are reviewed by management or their designee.

Reports: Monthly or quarterly statements and confirmations of transactions that you receive are prepared and issued by the account custodian. We do not prepare or provide reports or statements. However, if you have a question or problem with your statement you should contact your advisor immediately. Copies are provided via regular mail or electronic mail depending on your expressed preference. We do not internally prepare performance reports for clients.

Item 14 Client Referrals and Other Compensation

We do not engage solicitors or pay related or non-related persons for referring potential clients to our firm.

We do not accept or allow our advisors to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to you.

Item 15 Custody

We previously disclosed in the Fees and Compensation section (see Item 5) that we directly debit advisory fees from client accounts. Thus we are deemed to have custody of accounts for this purpose.

We do not have actual or constructive custody of client accounts. Further, we are prohibited from accepting on your behalf any funds, checks, or securities that are made payable or endorsed to our firm or personnel. We do not cash or custody funds at any time.

Asset Movement Authorization

Changes in the custody rules were effective in 2018 and per these changes we reviewed the terms of our asset movement authorizations. After careful and thorough consideration of many factors and discussions with industry professionals we changed our asset movement

authorization level to no more than custody with relief. This satisfies the requirements and allows us to continue servicing your accounts as we currently are with standing letters of authorization. Any other asset movement request requires your signature to the specific event.

Item 16 Investment Discretion

Under the Investment Advisory Agreement you hire us to provide discretionary services, strategies, and execution in your account. We may place trades in your account without contacting you prior to each trade to obtain permission.

Our discretionary authority includes the ability to do the following without contacting you:

- Determine the security to buy or sell
- Determine the amount of the security to buy or sell
- Determine the timing of when to buy or sell the security

You give us discretionary authority when you sign the Investment Advisory Agreement with your advisor, and you may limit this authority by giving us written instructions. You may also change or amend such authority by providing us with updated written instructions.

Item 17 Voting Client Securities

We do not accept instructions or vote proxy materials for your accounts. For all advisory accounts it is your responsibility to accept proxy and legal materials at the account address of record.

We are available to review and discuss with you pending actions but we will not act on your behalf in legal proceedings involving companies whose securities are held in your account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements.

Since we do not vote proxies for investment advisory accounts, you maintain exclusive responsibility for:

1. directing the manner in which proxies solicited by issuers of securities beneficially owned will be voted;
2. making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other events pertaining to the investment assets; and
3. instructing each custodian of the assets to send copies of all proxies and shareholder communications relating to your investment assets to your address of record.

Item 18 Financial Information

Financial Directions LLC has no additional financial circumstances to report.

Since we do not require or collect payment of fees in excess of \$1200 per account more than six months in advance of services rendered we are not required to include a financial statement.

Financial Directions LLC has not been the subject of a bankruptcy petition at any time since it began conducting business in 1996.

Part 2B of Form ADV: *Brochure Supplement*

John V. Anderson
1228 E Prince Rd
Tucson, AZ 85719
520-408-7777

Financial Directions LLC
1228 E Prince Road
Tucson, AZ 85719

12/31/2019

This brochure supplement provides information about John V. Anderson that supplements the Financial Directions LLC Brochure. A complete copy of our Brochure is available on our website www.financialdirectionsllc.com or upon request. Contact Mary Cherba or your advisor at 520-408-7777 if you have any questions about the contents of this document.

Additional information about John V. Anderson is available on the SEC's website at www.adviserinfo.sec.gov or FINRA's website at www.finra.org.

Item 2 Educational Background and Business Experience

Full Legal Name: John V. Anderson **Born:** 1948

Education

- Indiana University; Masters, Social Work & Health Care Admin; 1973

Business Experience

- Financial Directions LLC; Advisor; 1999 to Present

Item 3 Disciplinary Information

John V. Anderson has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment Related Activities

1. John V. Anderson is no longer engaged in the following investment related activities:

Registered representative of a broker-dealer; FINRA licenses retired 12/31/2015.

B. Non Investment Related Activities

John V. Anderson is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Item 5 Additional Compensation

John V. Anderson does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 Supervision

Supervisor: Stan Spackeen; Mary L. Cherba

Title: Managing Partner; Chief Compliance Officer

Phone Number: 520-408-7777

Part 2B of Form ADV: *Brochure Supplement*

Mary L. Cherba
1228 E Prince Rd
Tucson, AZ 85719
520-408-7777

Financial Directions LLC
1228 E Prince Road
Tucson, AZ 85719

12/31/2019

This brochure supplement provides information about Mary L. Cherba that supplements the Financial Directions LLC Brochure. A complete copy of our Brochure is available on our website www.financialdirectionsllc.com. Contact Mary Cherba or your advisor at 520-408-7777 if you have any questions about the contents of this supplement.

Additional information about Mary L. Cherba is available on the SEC's website at www.adviserinfo.sec.gov or FINRA's website at www.finra.org.

Item 2 Educational Background and Business Experience

Full Legal Name: Mary L. Cherba **Born:** 1954

Education

- University of Arizona; BS, Business Administration/Accounting; 1995

Business Experience

- Financial Directions LLC; Advisor and Accountant; 1998 to Present; and Chief Compliance Officer; 2005 to Present

Designations

Mary L. Cherba has earned the following designation and is in good standing with the granting authority:

- CPA; AZ State Board of Accountancy; 1996

Item 3 Disciplinary Information

Mary L. Cherba has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment Related Activities

1. Mary L. Cherba is also engaged in the following investment related activities:

Registered representative of a broker-dealer; FINRA licenses Series 7, 24, 63, 65, CRD #3129156.

2. Mary L. Cherba may receive commissions, bonuses or other compensation on the sale of certain securities or other investment products.

3. Financial Directions LLC pays Mary Cherba a salary for managerial and business support services independent of her advisory compensation.

B. Non Investment Related Activities

Independent of Financial Directions LLC Mary Cherba offers tax preparation services to advisory clients and non clients. This outside business or occupation does not provide substantial compensation or involve a substantial amount of her time. Financial Directions LLC does not financially participate in this activity. This service may present a conflict of interest to advisory services and possible conflicts must be disclosed.

Item 5 Additional Compensation

Mary L. Cherba does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 Supervision

Supervisor: Stan Spackeen

Title: Managing Partner

Phone Number: 520-408-7777

Part 2B of Form ADV: *Brochure Supplement*

Christopher Hambacher
1228 E Prince Rd
Tucson, AZ 85719
520-408-7777

Financial Directions LLC
1228 E Prince Road
Tucson, AZ 85719

12/31/2019

This brochure supplement provides information about Christopher Hambacher that supplements the Financial Directions LLC Brochure. A complete copy of our Brochure is available on our website www.financialdirectionsllc.com or upon request. Contact Mary Cherba or your advisor at 520-408-7777 if you have any questions about the contents of this document.

Additional information about Christopher Hambacher is available on the SEC's website at www.adviserinfo.sec.gov or FINRA's website at www.finra.org.

Item 2 Educational Background and Business Experience

Full Legal Name: Christopher M. Hambacher **Born:** 1981

Education

- University of Arizona; BS, Economics; 2003

Business Experience

- Financial Directions LLC; Advisor and Business Support; 7/2008 to Present
- University of Arizona; Office Specialist Senior; 10/2006 to 07/2009

Item 3 Disciplinary Information

Christopher Hambacher has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment Related Activities

1. Christopher Hambacher is also engaged in the following investment related activities:

Registered representative of a broker-dealer; FINRA licenses Series 7, 24, 63, CRD #4589318.

2. Christopher Hambacher may receive commissions, bonuses or other compensation on the sale of certain securities or other investment products.

3. Financial Directions LLC pays Christopher Hambacher a salary for managerial and business support services independent of his advisory compensation.

B. Non Investment Related Activities

Christopher Hambacher is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Item 5 Additional Compensation

Christopher Hambacher does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 Supervision

Supervisor: Stan Spackeen; Mary L. Cherba

Title: Managing Partner; Chief Compliance Officer

Phone Number: 520-408-7777

Part 2B of Form ADV: *Brochure Supplement*

Joseph Hogan
1228 E Prince Rd
Tucson, AZ 85719
520-408-7777

Financial Directions LLC
1228 E Prince Road
Tucson, AZ 85719

12/31/2019

This brochure supplement provides information about Joseph Hogan that supplements the Financial Directions LLC Brochure. A complete copy of our Brochure is available on our website www.financialdirectionsllc.com or upon request. Contact Mary Cherba or your advisor at 520-408-7777 if you have any questions about the contents of this document.

Additional information about Joseph Hogan is available on the SEC's website at www.adviserinfo.sec.gov or FINRA's website at www.finra.org.

Item 2 Educational Background and Business Experience

Full Legal Name: Joseph Hogan **Born:** 1956

Education

- City University of New York; Associate, Computer Programming; 1982

Business Experience

- Financial Directions LLC; Advisor; 2006 to Present

Item 3 Disciplinary Information

Joseph Hogan has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment Related Activities

1. Joseph Hogan is also engaged in the following investment related activities:

Registered representative of a broker-dealer; FINRA licenses Series 7, 63, CRD #1407072.

2. Joseph Hogan may receive commissions, bonuses or other compensation on the sale of certain securities or other investment products.

B. Non Investment Related Activities

Joseph Hogan is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Item 5 Additional Compensation

Joseph Hogan does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 Supervision

Supervisor: Stan Spackeen; Mary L. Cherba

Title: Managing Partner; Chief Compliance Officer

Phone Number: 520-408-7777

Part 2B of Form ADV: *Brochure Supplement*

Thomas M. Jones
1228 E Prince Rd
Tucson, AZ 85719
520-408-7777

Financial Directions LLC
1228 E Prince Road
Tucson, AZ 85719

12/31/2019

This brochure supplement provides information about Thomas M. Jones that supplements the Financial Directions LLC Brochure. A complete copy of our Brochure is available on our website www.financialdirectionsllc.com or upon request. Contact Mary Cherba or your advisor at 520-408-7777 if you have any questions about the contents of this document.

Additional information about Thomas M. Jones is available on the SEC's website at www.adviserinfo.sec.gov or FINRA's website at www.finra.org.

Item 2 Educational Background and Business Experience

Full Legal Name: Thomas M. Jones **Born:** 1947

Education

Some post high school education; no degree attained.

Business Experience

- Financial Directions LLC; Advisor; from 6/14/2000 to Present

Item 3 Disciplinary Information

Thomas M. Jones has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment Related Activities

1. Thomas M. Jones is no longer engaged in the following investment related activities:

Registered representative of a broker-dealer; FINRA licenses retired 12/31/2017.

B. Non Investment Related Activities

Thomas M. Jones is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Item 5 Additional Compensation

Thomas M. Jones does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 Supervision

Supervisor: Stan Spackeen; Mary L. Cherba

Title: Managing Partner; Chief Compliance Officer

Phone Number: 520-408-7777

Part 2B of Form ADV: *Brochure Supplement*

Stan W. Spackeen
1228 E Prince Rd
Tucson, AZ 85719
520-408-7777

Financial Directions LLC
1228 E Prince Road
Tucson, AZ 85719

12/31/2019

This brochure supplement provides information about Stan W. Spackeen that supplements the Financial Directions LLC Brochure. A complete copy of our Brochure is available on our website www.financialdirectionsllc.com or upon request. Contact Mary Cherba or your advisor at 520-408-7777 if you have any questions about the contents of this document.

Additional information about Stan W. Spackeen is available on the SEC's website at www.adviserinfo.sec.gov or FINRA's website at www.finra.org.

Item 2 Educational Background and Business Experience

Full Legal Name: Stan W. Spackeen **Born:** 1963

Education

- University of Arizona; BS, Finance; 1985

Business Experience

- Financial Directions LLC; Advisor and Managing Partner; 1996 to Present

Item 3 Disciplinary Information

Stan W. Spackeen has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment Related Activities

1. Stan W. Spackeen is also engaged in the following investment related activities:

Registered representative of a broker-dealer; FINRA licenses Series 7, 24, 63, 65, CRD #1398332.

2. Stan W. Spackeen may receive commissions, bonuses or other compensation on the sale of certain securities or other investment products.

B. Non Investment Related Activities

Stan W. Spackeen is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Item 5 Additional Compensation

Stan W. Spackeen does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 Supervision

Supervisor: Self; Mary L. Cherba

Title: Managing Partner; Chief Compliance Officer

Phone Number: 520-408-7777

Part 2B of Form ADV: *Brochure Supplement*

Guy Trujillo
6135 E Lewis Avenue
Scottsdale, AZ 85257
520-408-7777

Financial Directions LLC
1228 E Prince Road
Tucson, AZ 85719

12/31/2019

This brochure supplement provides information about Guy Trujillo that supplements the Financial Directions LLC Brochure. A complete copy of our Brochure is available on our website www.financialdirectionsllc.com or upon request. Contact Mary Cherba or your advisor at 520-408-7777 if you have any questions about the contents of this document.

Additional information about Guy Trujillo is available on the SEC's website at www.adviserinfo.sec.gov or FINRA's website at www.finra.org.

Item 2 Educational Background and Business Experience

Full Legal Name: Guy W. Trujillo **Born:** 1941

Education

- Arizona State University; Doctorate, Counseling Psychology; 1975

Business Experience

- Financial Directions LLC; Advisor; 2001 to Present

Item 3 Disciplinary Information

Guy Trujillo has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment Related Activities

1. Guy Trujillo is no longer engaged in the following investment related activities:

Registered representative of a broker-dealer; FINRA licenses retired 12/31/2016.

B. Non Investment Related Activities

Guy Trujillo is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Item 5 Additional Compensation

Guy Trujillo does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 Supervision

Supervisor: Stan Spackeen; Mary L. Cherba

Title: Managing Partner; Chief Compliance Officer

Phone Number: 520-408-7777