Item 1 - Cover Page



A Registered Investment Advisor

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www.familyfirstfinancial.com

Form ADV Part 2 March 24, 2018

This brochure provides clients and prospective clients with information about Family First Financial Planning and the qualifications, business practices, and nature of its services that should be carefully considered before becoming an advisory client.

The contents of this brochure have not been approved or verified by the U.S. Securities and Exchange Commission (SEC) or any other state or federal governmental authority. While the firm and its associates may be registered with the States of Florida, Georgia, or other jurisdictions, it does not imply a certain level of skill or training on the part of the firm or its associated personnel.

Questions relative to the firm, its services, or this ADV Part 2 may be made to the attention of Ms. Leslie Trowbridge at (772) 781-7648. Additional information about the firm, other advisory firms, or associated investment advisor representatives is available on the Internet at www.adviserinfo.sec.gov.

Item 2 - Material Changes

The firm has amended its Form ADV Part 2 Brochure since the previous version dated March 24, 2017 as part of the firm's annual Form ADV amendment. No material changes have occurred since the last brochure.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's Website: www.adviserinfo.sec.gov or you may contact our firm at (772) 781-7648.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

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Important Note: Throughout this document, Family First Financial Planning may be referred to by the following terms: "the firm," "we," "us," or "our." The client or prospective client may also be referred to as: "you," "your," etc.

This brochure contains 21 pages and should not be considered complete without all pages.



Item 4 - Advisory Business

Why the Tree?

In many faiths and cultures, trees signify the interconnectedness of families throughout generations. The trunk represents strength and stability and the branches and leaves reach toward the sky symbolizing the importance of reaching out to heaven (and for your dreams). Trees provide shelter and provide the kind of stability one gets when he or she is financially secure. They lose their leaves, grow new ones, and some bear fruit... just like the stages of our lives. With nurture and care trees are a gift for today and for generations to come. At Family First Financial Planning, we can think of no greater symbol to hang our hats on... than the formidable, life-bearing tree.

We specialize in the unique needs of everyday people. For consumers, that means affordable access to objective, expert advice as needed. We hold ourselves to a *fiduciary standard*, which means our firm and its associates will act in the utmost good faith and perform in a manner believed to be in the best interest of our clients. As investment advisors we are required to put you -- the client -- first. We feel this sets us apart from other firms that may be held to a, perhaps lesser, *suitability* standard and may not be required under current regulation to place clients' interests ahead of their own or to disclose their conflicts of interest involving their clients' transactions.

About Our Firm

Leslie Ellen Trowbridge, formerly Leslie Trowbridge Corcoran, maintains a Florida-based sole proprietorship investment advisory firm formed in 1998 and doing business as Family First Financial Planning. Our firm provides fee-only financial planning, investment consultation and financial advisory services. In addition to our registration as an investment advisor in Florida and Georgia, our firm and its associates may register or meet certain exemptions to registration in other states in which we conduct business. Ms. Trowbridge (noted in Item 19) also serves as our firm principal (supervisor).

Approximately 60% of Family First Financial Planning's advisory activity business is oriented toward *financial planning services* involving retirement projections, expense budgeting and savings; education, insurance, charitable and estate planning, and risk management, among others. Another 35% of our time and effort is oriented toward furnishing periodic investment advice through our *investment consultation services*. Another 5% of our firm's activities involve providing *investment management services* for client accounts that does not involve continuous monitoring or discretionary trading authority. Our firm does not have client assets directly under its management.

Our Services

Initial Meeting

If you are a prospective client, we will provide a 30-minute complimentary interview by telephone or in person that is conducted by a qualified representative of our firm to determine the scope of services to be provided. At this meeting, you have the opportunity to "get acquainted" with a financial planner that will be working with you and to learn about our firm's services.

During or prior to this meeting, we will also provide our current ADV Part 2 brochure that incorporates our Privacy Policy. This disclosure document may also be found on our firm's website at www.familyfirstfinancial.com.

At the end of the thirty minutes, if you decide to move forward and engage our firm for its services, we must enter into a written engagement agreement.

It is important that the information or financial statements you provide are accurate. We may (but are not obligated to) verify the information you have provided and that will be used in our planning or advisory processes.

Financial Planning Services

Advice may be provided to you on such subjects as cash flow analysis, retirement capital needs, education funding, risk management, tax strategies and estate planning, or other specific needs as you may request. Our financial planning services may be broad-based or more narrowly focused as you desire. Note that when these services focus only on certain areas of your interest or need, however, your overall financial situation or needs may not be fully addressed due to limitations you may have established.

We require financial planning clients to furnish certain records and documents for our review, which may include:

- Prior years' tax returns
- Brokerage account statements
- Trust account statements
- Retirement plan account statements
- Loan documents
- Credit card statements
- Pavcheck stubs
- Mutual fund account statements
- Employee benefits booklet
- Legal documents (wills, trusts, decrees, etc.)
- Insurance
- Other pertinent documents

Once we have received these documents we will review them in detail and make recommendations based on your current situation, expectations, objectives and time horizon. At the same time, your risk tolerance — which is your ability to live comfortably with risk in association with investing - will be taken into account.

Following our review, we will prepare analyses of your current financial situation and possible future scenarios, when appropriate. We will then present our analysis, which generally includes a written summary of the significant observations, assumptions and recommendations in each area we were engaged to provide advice. For more broad-based planning, your engagement may include investment consultation services as described in the following paragraph.

Investment Consultation Services

Our investment consultation services may involve providing information on the types of investment vehicles available; investment analysis and strategies, asset selection, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian of your choosing.

This service is offered as part of our planning process or it may be provided on a "stand-alone" basis, such as needing advice on an employer 401(k) allocation.

Ongoing Financial Advisory Services

After your initial planning project is completed, you may want to engage our firm for ongoing planning, implementation assistance and review services. Financial planning is a continual process and should be adjusted for changes in your personal financial situation or changes in regulation (i.e., tax code, etc.). If plans are not updated and reviewed on a consistent basis, they become obsolete. Additionally, at the conclusion of the initial planning project, you will be presented with a plan that needs to be implemented. By opting for ongoing financial advisory services, your financial planner will be able to assist you with implementation of your overall financial plan.

We recommend both active and passive investment strategies deemed appropriate for the individual investor. In general, we prefer to employ Modern Portfolio Theory as part of our investment strategy, which is described in further detail in Item 8 of this brochure.

Ongoing financial advisory services are not investment management or supervisory services; we do not actively manage our clients' accounts or have discretionary trading authority over any account.

Workshop Presentations

We may also provide educational workshops in person or via webinar on an "as announced" basis for groups desiring general advice on investments and personal finance. Topics may include issues related to wealth management, financial planning, retirement strategies, or various other economic and investment topics.

Our workshops are educational in nature and do not involve the sale of any investment products. Information presented will not be based on any one person's need, nor do we provide individualized investment advice to workshop attendees during these general sessions.

General Information

You will retain full discretion over all implementation decisions and are free to accept or reject any recommendation we make. Further, it remains your responsibility to promptly notify us if there is any change in your financial situation or investment objectives for the purpose of our reviewing or revising previous recommendations and/or services.

We do not serve as sponsor or portfolio manager for a wrap fee investment program, nor do we provide legal or accounting services. With your consent, we may work with your attorney or accountant to assist with the coordination and implementation of accepted strategies. You should be aware that these advisors may bill you separately for services and these fees will be in addition to those of our firm.

Our firm will use its best judgment and good faith effort in rendering its services. Family First Financial Planning cannot warrant or guarantee any particular level of account performance, or that account will be profitable over time. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, our firm will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by our firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from our adherence to your direction or that of your legal agent; or any act or failure to act by a service provider maintaining an account.

Notwithstanding the preceding statement, nothing within our client agreement is intended to diminish in any way our fiduciary obligation to act in your best interest or in any way limit or waive your rights under federal or state securities laws or the rules pursuant those laws.

Item 5 - Fees and Compensation¹

Hourly Fee

We generally offer all our services under a fixed fee engagement, described further in a following paragraph, however, certain financial planning and investment consultation services may necessitate an hourly fee engagement, such a one-time follow up session on your investment allocation. Our current fee is \$275 per hour and will be billed for the actual time spent by our firm; assessed in 15-minute increments, and a partial increment will be treated as a whole.

As described in Item 4, the first 30-minute introductory session is complimentary. If you choose to engage our firm under an hourly engagement, we will approximate the amount of time involved to perform those services multiplied by the current hourly rate to provide you with an estimated fee.

We may require a deposit for our hourly services engagements in the amount of the lesser of \$500 or one-half of the lower-end of the estimated fee range. The balance of fees due are payable immediately upon our presentation of the plan or advice to you or your legal agent. Services to be provided and the anticipated fee range are detailed in the written service agreement.

Fixed Fee

Financial Planning and Investment Consultation - We generally offer our financial planning and investment consultation on a fixed fee basis. The fixed rate will generally be based upon our current hourly billing rate of \$275 per hour multiplied by the estimated total number of hours required to complete the project. Services to be provided and the anticipated fixed fee will be detailed in the written service agreement.

We may require a deposit for fixed fee engagements in the amount of the lesser of \$500 or one-half of the fixed fee. The balance of fees due are payable immediately upon our presentation of the plan or advice to you or your legal agent. Projects spanning more than three months may be billed quarterly, in advance.

Financial Advisory Services - We offer our broad-based financial advisory services on a fixed (retainer) fee basis. The fee for the ongoing financial advisory services will be set at the start of the engagement based on the client's assets and financial planning needs. A minimum annual fee of \$3,000 is required. Services to be provided under this form of engagement and the anticipated fee range are detailed in the written service agreement.

¹We reserve the right (but are not obligated) to assess a lower fee to pre-existing clients that have engaged the firm prior to the date of this brochure as well as for those services provided to firm associates and related persons' accounts. Fees are negotiable at the discretion of our firm principal and comparable services may be provided elsewhere for a lower fee.

The annual fee will be payable quarterly, in advance. We will send you a written invoice each quarter that will include the total amount of the fee due and the covered time period.

Further information about our fees in relationship to our operational practices is noted in Item 12 of this document.

Workshops

Our workshop engagements are generally *pro bono* in nature. In the event there is a charge for a workshop, it is anticipated to be paid by the engagement sponsor, such as an employer or association. Fees for these events are typically a flat-rate amount based on the firm's hourly fee and/or cost of workshop materials, and would be negotiated with the sponsor in advance of the presentation.

Potential Additional Fees

Specific product recommendations made by our firm usually involve "no-load" (i.e., no commission) products, if available, or low-load products. In some cases, such as with insurance or actively-managed mutual funds, there may not be a suitable selection of no-load products available for recommendation, however, neither our firm nor our associates will be paid a commission on your purchase.

Any transactional or custodial fees assessed by a selected service provider, individual retirement account fees, or qualified retirement plan account termination fees are borne by you as noted in the current, separate fee schedule of the selected provider. Fees paid to our firm for our services are separate from any charges you may pay for mutual funds, exchange-trade funds (ETFs) or other investments of this type. We do not receive "trailer" or SEC Rule 12b-1 fees from any investment company.

Fees charged by these issuers are detailed in their prospectuses or product descriptions and you are encouraged to read these documents before investing. Our firm and its associates receive none of these described or similar fees or charges.

Termination of Services

Either party may terminate an agreement at any time with written notice to the other. If the agreement is terminated, all fees due at time of termination will be due and payable by you immediately. Family First will refund any unearned, prepaid fees within thirty days of written request from the client.

Our firm will not be responsible for future allocations, transactional services or investment advice upon our receipt of a termination notice.

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

Our fees will not be based upon a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as "performance-based fees." Family First Financial Planning does not use a performance-based fee structure because of the potential conflict of interest this type of fee structure may pose. Performance-based compensation may create an incentive for a firm to recommend an investment that may carry a higher degree of risk to a client.

Side-by-side management refers to a firm simultaneously managing accounts that do pay performance based fees (such as a hedge fund) and those that do not; this type of arrangement, and the conflict of interest it may pose, is also not applicable to our firm's practices.

Item 7 - Types of Clients

We provide our services to individual investors, trusts, estates, charitable organizations, and businesses of various scale to assist them in meeting their financial objectives in what is believed to be a cost-effective way.

Our ability to provide our service and advice depends on access to important information. Accordingly, you are expected to provide us with an adequate level of information and supporting documentation throughout the term of the engagement, including but not limited to: source of funds; income levels, your (or your legal agent's) authority to act on behalf of the account, among other information. This helps us determine the appropriateness of our financial planning or investment strategy for you and your account.

It is very important that you keep us up-to-date on significant changes that may call for an update to your financial and investment plans. Events such as job changes, retirement, change in marital status, or the purchase or sale of a home or business can have a tremendous impact on your circumstances and needs. If we are aware of such events, we can make the adjustments needed to your plan or advice in order to keep you on track toward your goals.

We do not require minimum income levels, minimum level of assets, or other conditions for our financial planning and investment consultation services. We require a minimum annual account fee of \$3,000 for our financial advisory services engagements. In light of this requirement, our financial advisory services may not be economically feasible for those clients whose liquid assets have been less than \$100,000 over the previous two years.

We reserve the right to decline services to any prospective client for any reason.

<u>Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss</u>

Method of Analysis

If we are engaged to provide investment consultation or financial advisory services, we will first evaluate several factors, including your:

- current financial situation;
- current and long-term needs;
- investment goals and objectives;
- · level of investment knowledge; and
- tolerance for risk.

To achieve this, we typically employ fundamental analyses to develop long-term investment strategies which involve evaluating economic factors including interest rates, current state of the economy, future growth of an issuer or sector, among others.

Our research and recommendations may be drawn from sources that include financial publications; investment analysis and reporting software; research materials from outside sources; corporate rating services; annual reports, prospectuses and other regulatory filings; and company press releases.

We make asset allocation and investment policy decisions based on these and other factors. We will then discuss with you how, in our best judgment, to meet your objectives while at the same time seeking a prudent level of risk exposure.

Investment Strategies

Our firm believes that a long term, buy-and-hold investment strategy is preferred over active investment strategies. Investment policy decisions are made, in our best judgment, to help you achieve your overall financial objectives while minimizing risk exposure.

We also believe that asset allocation is a key component of investment portfolio design and that the appropriate allocation of assets across diverse investment categories (stock vs. bond, foreign vs. domestic, large cap vs. small cap, etc.) is a primary determinant of portfolio returns and critical to the long-term success of an investor's financial objectives.

Our staff will assist in rebalancing your portfolio, when necessary, in an attempt to maintain an optimal allocation while minimizing tax exposures, trading costs, etc. In limited circumstances and on request, we will offer advice on shorter-term investment strategies.

We generally develop diversified portfolios principally through the use of both actively and passively managed, cost-efficient index mutual funds or ETFs. Existing positions within an account will be evaluated and may be recommended to remain when deemed appropriate.

Risk of Loss

While we believe our strategies and investment recommendation are designed to potentially produce the highest possible return for a given level of risk, we cannot guarantee that an investment objective or planning goal will be achieved. Past performance is not necessarily indicative of future results. Some investment decisions may result in loss, including potential loss of the original principal invested. Each client must be able to bear the various risks involved in the investment of account assets, which may include market, currency, interest rate, liquidity, operational or political risk, among others.

When our research and analyses is based upon commercially available software, rating services, general market and financial information, or due diligence reviews, we are relying upon the accuracy and validity of the information or capabilities being provided by selected vendors, rating services, market data, and the issuers themselves. We make a reasonable effort to determine the accuracy of the information received but we cannot predict events, actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice to a client or account.

When a portfolio employs a passive, efficient markets theory (such as Modern Portfolio Theory), you will need to consider the potential risk that your broader allocation may generate lower-than-expected returns than that from a specific asset, and that the return on each type of asset is a deviation from the average return from the asset class. We believe this variance from the "expected return" is generally low under normal market conditions if the portfolio is made up of diverse, low or non-correlated assets.

If your preferred investment strategy involves more frequent trading, it may result in additional transactional costs or create taxable events, and in some instances potentially reducing or negating any benefit derived by shorter term investing.

Investment vehicles such as ETFs and indexed funds have the potential to be affected by "tracking error risk," which might be defined as a deviation from their stated benchmark (index). Since the core of a portfolio may attempt to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a "sample index" that may not as closely align the stated benchmark. In these instances, the firm may choose to reduce the weighting of a holding or use a "replicate index" position as part of its core holdings to minimize the effects of the tracking error in relation to the overall portfolio.

Also, while many index funds and ETFs are known for their potential tax-efficiency and higher "qualified dividend income" (QDI) percentages, there are certain asset classes or holding periods within a fund or ETF that may not benefit. Shorter holding periods or certain commodities and currencies (potentially within the fund/ETF) may be considered nonqualified, therefore the investments QDI will be considered if tax efficiency is an important aspect of your portfolio.

Item 9 - Disciplinary Information

Neither our firm nor its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding that would reflect poorly upon our firm's advisory business or the integrity of our firm.

Item 10 - Other Financial Industry Activities and Affiliations

Our policies require our firm and its associates to conduct business activities in a manner that avoid actual or potential conflicts of interest between the firm, its employees and clients, or that may be contrary to law.

We will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest which might reasonably compromise our impartiality or independence.

Neither the firm nor its management is registered, nor is there an application pending to register, as a broker/dealer or a registered representative of a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) broker/dealer. Further, our firm and its management do not have a material relationship with any of the following types of entities:

- municipal securities dealer, or government securities dealer or broker;
- futures commission merchant, commodity pool operator, or commodity trading advisor;
- banking or thrift institution;
- lawyer or law firm;*
- accountant or accounting firm;*
- insurance company or agency;*
- pension consultant;
- real estate broker or dealer;
- sponsor or syndicator of limited partnerships; or
- investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund).

Should we ever provide you with a recommendation to an unaffiliated registered investment advisor to manage your portfolio, we will first ensure we have conducted what we believe is an appropriate level of due diligence on the recommended third-party investment advisor, to include ensuring their firm is appropriately registered or notice-filed within your jurisdiction. Please note that we are not paid for this referral.

^{*}Upon your request and when appropriate to do so, we may provide referrals to various professionals other in your area, such as an accountant or attorney. We do not have an agreement with or receive fees from these professionals for these informal referrals. Any fees charged by these other entities for their services are completely separate from advisory fees charged by our advisory firm.

Our firm is a member of the Garrett Planning Network, Inc., an organization that assists financial planners in fee-only, financial planning practices. Garrett Planning Network is not a registered financial industry participant, however, we do pay an annual membership fee for services that include training, compliance and operational support to enhance our ability to provide quality service and advice to the investing public.

Associates of the firm may hold individual membership or serve on committees or board of professional industry associations such as the National Association of Personal Financial Advisors (NAPFA); Financial Planning Association (FPA), or the Certified Financial Planner Board of Standards, Inc. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and ongoing educational requirements.

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

Code of Ethics

We have adopted a Code of Ethics that establishes policies of ethical conduct for all our personnel. Our firm accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Firm policies include prohibitions against insider trading, circulation of industry rumor, certain political contributions, among others.

Associates who are CFP® designees or FPA members also adhere to the Certified Financial Planner Board of Standards Code of Ethics. These principles include:

<u>Principle 1 – Integrity</u>

An advisor will provide professional services with integrity. Integrity demands honesty and candor which must not be subordinated to personal gain and advantage.

Advisors are placed by clients in positions of trust by clients, and the ultimate source of that trust is the advisor's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion; but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 – Objectivity

An advisor will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an advisor functions, an advisor should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

Principle 3 - Competence

Advisors will maintain the necessary knowledge and skill to provide professional services competently.

Competence means attaining and maintaining an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Advisors make a continuing commitment to learning and professional improvement.

Principle 4 – Fairness

Advisors will be fair and reasonable in all professional relationships. Fairness requires impartiality, intellectual honesty and disclosure of material conflict(s) of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

Principle 5 - Confidentiality

Advisors will protect the confidentiality of all client information. Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 - Professionalism

Advisors will act in a manner that demonstrates exemplary professional conduct.

Professionalism requires behaving with dignity and courtesy to all who use their services, fellow professionals, and those in related professions. Advisors cooperate with fellow advisors to enhance and maintain the profession's public image and improve the quality of services.

Principle 7 - Diligence

Advisors will provide professional services diligently. Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

Additionally, associates of our firm that are NAPFA or Garrett members adhere to the NAPFA *Fiduciary Oath* that states that:

"The advisor shall exercise his/her best efforts to act in good faith and in the best interests of the client.

The advisor shall provide written disclosure to the client prior to the engagement of the advisor, and thereafter throughout the term of the engagement, of any conflicts of interest, which will or reasonably may compromise the impartiality or independence of the advisor.

The advisor, or any party in which the advisor has a financial interest, does not receive any compensation or other remuneration that is contingent on any client's purchase or sale of a financial product.

The advisor does not receive a fee or other compensation from another party based on the referral of a client or the client's business.

Following the NAPFA Fiduciary Oath means I shall:

- * Always act in good faith and with candor.
- * Be proactive in disclosing any conflicts of interest that may impact a client.
- * Not accept any referral fees or compensation contingent upon the purchase or sale of a financial product."

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

Privacy Policy

We respect the privacy of all our clients and prospective clients, both past and present. We recognize that you have entrusted us with non-public personal information and it is important to us that all employees and clients of our firm know our policy concerning what we do with that information.

We collect personal information about our clients from the following sources:

- Information our clients provide to us to complete their financial plan or investment recommendation;
- Information our clients provide to us in agreements, account applications, and other documents completed in connection with the opening and maintenance of their accounts;
- Information our clients provide to us orally; and
- Information we may receive from service providers, such as custodians, about client transactions.

We do not disclose non-public personal information about our clients to anyone, except in the following circumstances:

- When required to provide services our clients have requested;
- When our clients have specifically authorized us to do so in writing;
- When required during the course of a firm assessment (i.e., independent audit); or
- When permitted or required by law (i.e., periodic regulatory examination).

Within our firm, we restrict access to client information to staff that need to know that information. All personnel and our service providers understand that everything handled in our office is confidential and they are instructed to not discuss client information with someone else that may request information about an account unless they are specifically authorized in writing by the client to do so. This includes, for example, providing information about a spouse's IRA account; children about parents' accounts, etc.

To ensure security and confidentiality, we maintain physical, electronic, and procedural safeguards to protect the privacy of client information.

We will notify you annually of our privacy policy and at any time, in advance, if our policy is expected to change.

Participation or Interest in Client Transactions

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

Our employees are prohibited from borrowing from or lending to a client unless the client is an approved financial institution.

We recognize that should we act as the advisor to the sponsor of an ERISA-qualified retirement plan (i.e., 401(k) or pension plan) and one of our associates serves in an advisory capacity to one or more of the plan's

participants, a potential or implied conflict of interest may occur. We may require our associate to cease in this plan participant advisory capacity or, upon disclosure to and approval from the plan sponsor, allow the dual advisory role to continue with consideration being made to offset fees where appropriate.

Our firm is able to provide a broad range of services to you and all of our clients, which includes financial planning, investment consultation services, and financial advisory services where we are paid a fee. Due to our firm's ability to offer one or more of these services to you and possibly receive a fee for each type of engagement, a potential conflict of interest may exist. Therefore, you are under no obligation to act upon our recommendations and, if you elect to act on any of our recommendations, you are under no obligation to complete all of them through our firm.

Firm and Personal Trading

Our firm does not trade for its own account, however, a "related person" (associates, their immediate family members, etc.) may buy or sell securities similar or identical to those recommended to clients for their accounts. Related persons may also buy or sell securities different from those we recommend. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. At no time, however, will our firm or any related party receive preferential treatment over our clients.

In an effort to reduce or eliminate certain conflicts of interest involving personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by a principal of our firm in advance of the transaction in an account, and we will maintain the required personal securities transaction records per current regulation.

Item 12 - Brokerage Practices

Family First Financial Planning is not affiliated with any bank, custodian, or broker-dealer firm ("service provider"). When we are engaged to provide investment consultation or financial advisory services, we will offer to use the service provider with whom your assets are currently maintained. Should you prefer a new provider, we may suggest the retail services division of Vanguard.

We believe the selection of Vanguard is appropriate due to what we would describe as the industry's "best practices," combining the elements of low (not necessarily the lowest) transaction costs to our clients for the benefit of custody of their securities, and service to both our client and the firm our effort to better serve an account. Such services involve, for example, handling distributions and withdrawals, account billing services, electronic client statements, etc. Research is also a modest consideration.

It is our policy to restrict non-cash compensation to products or services that enhance our ability to render quality advice and service to all of our clients that utilize any of Vanguard's services. Although we may refer clients to Vanguard, we derive no special benefit (any more than any other investment advisor) from doing so, nor do we "pay up" (incur extra fees) to receive these additional services.

Industry fees and schedules periodically change, and subsequently transaction fees charged by Vanguard may be higher or lower than those charged by other service providers. We believe, in good faith, that rates are reasonable in relation to the value of the services received. We periodically conduct an assessment of Vanguard, its range of services and capabilities, as well as reasonableness of its fees in comparison to their industry peer group.

Client Referrals

All compensation paid to our firm is paid directly by our clients and, therefore, we do not receive additional compensation when you engage a recommended service provider.

Directed Brokerage

We do not require or engage in directed brokerage involving our accounts. Due to the nature of the firm's advisory services, each client is free to use any particular service provider to execute some or all of their transactions for his or her account. In these circumstances, the client will be responsible for negotiating the terms and/or arrangements for their account. Our firm will not be obligated to conduct due diligence, seek better execution services or prices from these broker/dealers, or aggregate client transactions for execution.

Trade Aggregation

Since our firm is not directly engaged for continuous investment supervisory services and does not offer discretionary trading services, it does not have the opportunity to aggregate trades on behalf of client accounts. Transactions for each of our clients will be completed independently and this may result in potentially less favorable transaction rates or greater price spreads than for accounts for which trades have been aggregated.

Item 13 - Review of Accounts

Financial Planning and Investment Consultation Services

Periodic financial check-ups or reviews are recommended if you are receiving our financial planning and investment consultation services, and it is your responsibility to initiate these reviews.

A good rule-of-thumb for future visits is semi-annually or as material changes occur in your financial situation (i.e., loss of a job, retirement, receipt of a significant bonus, an inheritance, the birth of a new child, or other circumstances).

Reviews will be conducted by your assigned financial planner and normally involve analysis and possible revision of a previous financial plan or investment allocation. Portfolio "Snapshot" reports may be provided when our firm is engaged to provide periodic asset allocation or investment advice, however, we will not provide ongoing performance reporting under these engagements.

Financial Advisory Services

After assisting you with the implementation of your plan, meetings will be held with your assigned financial planner at least quarterly, and you will have access to your planner via phone and email during regular business hours.

Generally, reviews will be completed by you and your financial planner on the following cycles:

- Investments reviewed quarterly;
- Goals and objectives reviewed and updated as needed;
- Personal priorities reassessed at least annually; and
- Budgeting, estate planning, insurance coverage and saving strategies reviewed at least annually.

If you have an investment account, you will receive account statements sent directly from mutual fund companies, transfer agents, custodians or brokerage companies where your investments are maintained and you should read these carefully. Our firm may provide periodic portfolio reviews for these accounts; however, we do not provide our own ongoing performance reporting.

<u>Item 14 - Client Referrals and Other Compensation</u>

We do not engage in solicitation activities as defined by statute.

As noted earlier, Family First Financial Planning and its associates may be members of the Garrett Planning Network, FPA or other professional associations. A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for participant firms or individual financial planners within a selected state or region.

These passive websites may provide means for interested persons to contact a firm or financial planner via electronic mail, telephone number, or other contact information, in order to interview the participating firm or planner. Members of the public may also choose to telephone association staff to inquire about a firm or individual planner within their area, and they would receive the same or similar information. A portion of our membership fees may be used so that our name will be listed in some or all of these entities' websites (or other similar listings).

Prospective clients locating our firm or one of our associates via this method are not actively marketed by these associations. Clients who find us in this way do not pay more for their services than clients referred to us in another fashion, such as by another client. We do not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.

We may provide referrals to various other professionals, such as an attorney or accountant, as a service to our clients. We do not have an agreement with or receive referral fees from these professionals for these informal referrals. Any fees charged by these other entities for their services are completely separate from fees charged by Family First Financial Planning.

Item 15 - Custody

Your funds and securities will be maintained by an unaffiliated, qualified custodian that you select, such as a bank, broker/dealer, mutual fund company, or transfer agent -- not with our firm or our associates. In keeping with our policy of not having custody of client funds or securities, we:

- Restrict our firm and associates from acting as trustee² for or having full power of attorney over a client account;
- Do not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm;
- Will not collect fees of \$500 or more for services to be performed six months or more in advance; and
- Will not authorize any associate to have knowledge of a client's personal account access information (i.e., online 401(k), brokerage or bank accounts), even for the convenience or accommodation of the client or their legal agent.

² When permitted by a jurisdiction, associates may act as trustee for accounts of their immediate family members.

You will be provided with transaction confirmations and summary account statements provided directly to you by your selected service provider. Typically, these statements are provided on a monthly or quarterly basis, or as transactions occur. We will not create a statement for you nor be the sole recipient of your statements.

Should you ever receive periodic reports or "Snapshots" from our firm that may include performance-related information, you are urged to compare your account statements that you have received directly from your service provider with any report you receive from our firm.

Item 16 - Investment Discretion

We do not provide ongoing investment supervisory services, therefore, we do not engage in discretionary trading within client accounts.

Item 17 - Voting Client Securities

Proxy Voting

Our firm does not vote proxies on your behalf nor do we offer guidance on the voting of client proxies. You will maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities that are beneficially owned by you shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other events pertaining to your holdings.

Other Corporate Actions

We will have no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets.

Receipt of Materials

You may receive proxies or other solicitations directly from your selected custodian or transfer agent. If our firm receives correspondence relating to the voting of your securities, class action litigation, or other corporate actions, we typically forward the correspondence to your address of record or to another entity such as your attorney if you direct us to do so.

Item 18 - Financial Information

Balance Sheet

We do not directly withdraw our fees from a client bank or investment account. Our firm will not have custody of client assets, this includes our not collecting fees of \$500 or more for services we will perform six months or more in advance.

Due to the nature of our firm's services and operational practices, an audited balance sheet is not required nor included in this brochure.

<u>Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients</u>

The firm and its management do not have a financial condition likely to impair our ability to meet our commitment to our clients.

Bankruptcy Petitions during the Past 10 Years

The firm and its management have not been the subject of a bankruptcy petition at any time during the past 10 years.

<u>Item 19 - Requirements for State-Registered Advisors</u>

See the accompanying ADV Part 2Bs for clarifying information.

ADV Part 2B: Brochure Supplement (Advisory Personnel – Leslie Ellen Trowbridge)

Firm Name

Leslie Ellen Trowbridge, doing business as Family First Financial Planning 850 NW Federal Highway, Suite 150 Stuart, FL 34994 (772) 781-7648 www.familyfirstfinancial.com

Owner/Firm Principal/Investment Advisor Representative

Leslie Ellen Trowbridge [Born 1962] Formerly Leslie Trowbridge Corcoran

Educational Background and Business Experience

Educational Background

B.S. Finance - Auburn University; Auburn, AL
CERTIFIED FINANCIAL PLANNER™ Practitioner (CFP®)¹

Business Experience

Family First Financial Planning – Owner/Firm Principal (1998-Present)

Disciplinary Information

Registered investment advisors are required to disclose certain material facts regarding any legal or disciplinary events that would be material to your evaluation of each officer or a supervised person providing investment advice. No reportable information is applicable to this section. Neither the firm nor Ms. Trowbridge has been the subject of any disciplinary action.

Other Business Activities: None

Additional Compensation

Ms. Trowbridge is not compensated for advisory services involving performance-based fees. She is not a senior executive of or insider to an issuer of a security. Our firm also prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients.

Ms. Trowbridge is not registered nor has an application pending to register as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. Therefore, she does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products, including that as a registered representative of a broker/dealer, and including distribution or service ("trail") fees from the sale of mutual funds.

Supervision

Ms. Trowbridge serves in multiple capacities with our firm, including Firm Principal (Supervisor) and Investment Advisor Representative. We recognize by not having all organizational duties segregated may potentially create a conflict of interest, however, we believe our policies and procedures are designed to ensure appropriate recordkeeping and supervision. Certain functions may be outsourced to assist in these

efforts when deemed necessary. Questions relative to the firm, its services, or this ADV Part 2 may be made to the attention of Ms. Trowbridge at (772) 781-7648.

Additional information about our firm, other advisory firms, associated investment advisor representatives, including Ms. Trowbridge, is available on the Internet at www.adviserinfo.sec.gov. A search of this site for firms or their associated personnel can be accomplished by their name or a unique firm identifier, known as an *IARD number*. The IARD number for Family First Financial Planning is 131254. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling the Florida Securities Division at (800) 848-3792.

Requirements for State-Registered Advisors

There have been neither arbitration awards nor any awards where the firm or Ms. Trowbridge has been found liable in any civil, self-regulatory or administrative proceeding. Family First Financial Planning and Ms. Trowbridge have not been the subject of a bankruptcy petition.

¹The **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.

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

- Education Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

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

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