



W I G G I N

FINANCIAL PLANNING

“TOGETHER WE PLAN FOR LIFE”

Wiggin Financial Planning, P.A.

/DBA Wiggin Financial Services

February 14, 2022

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Please Note:

This brochure has not been approved by the Securities and Exchange Commission or any State Securities Authority. Being a Registered Investment Advisor does **not** imply a certain level of skill or training.

Material Changes

Item 2: Material Changes

There are no material changes in this brochure from the last annual updating amendment on 02/04/2021 of Wiggin Financial Planning, P.A.. Material changes relate to Wiggin Financial Planning, P.A.'s policies, practices or conflicts of interests.

We 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. Interested parties are also able to download this brochure from the SEC's website at www.adviserinfo.sec.gov or you may contact our firm at (954) 390-6191.

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 and throughout the engagement.

Table of Contents

Advisory Business	5
Fees and Compensation	6
Performance-Based Fees and Side by Side Management.....	8
Types of Clients	9
Methods of Analysis, Investment Strategies and Risk of Loss	9
Disciplinary Information	10
Other Financial Industry Activities and Affiliations.....	10
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
Personal Securities Transactions.....	16
Brokerage Practices.....	18
Review of Accounts	18
Client Referrals and Other Compensation	18
Custody	18
Investment Discretion	19
Voting Client Securities.....	19
Financial Information	19
Additional Requirements for State-Registered Advisors.....	19
Deborah F. Wiggin, CFP, RLP.....	20

Important Information

Throughout this document, Wiggin Financial Planning P.A. shall also be referred to as the “firm,” “our,” “we,” or “us,” and these terms are utilized for the reader’s ease of use while reviewing the brochure. The client or prospective client may be also referred to as “the client,” “client,” etc., and refers to a client engagement involving a single *person* as well as two or more *persons* and may refer to natural persons as well as legal entities. The term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary (i.e., Internet address, etc.). Our firm maintains a business continuity and succession plan that is integrated within the organization to ensure it appropriately responds to events that pose a significant disruption to its operations. A statement concerning the current plan is available upon request.

Advisory Business

Wiggin Financial Planning, P.A. is a fee-only financial planning company. We offer general financial planning. We help clients review their current financial position and assist in developing written financial goals. We provide written analysis and recommendations in the form of a financial plan. We help our clients implement and monitor their plan.

The Financial Planning Process:

1. Complete the Initial Conversation.
2. Prepare and send Proposal.
3. Send client(s) the Risk Analysis and Money Max Profile Questionnaire(s).
4. Input the Risk Analysis and Money Max Profile(s). Create the reports.
5. Fill in the FP Questionnaire with the client(s) and review the Risk Analysis and Money Max Profile Report(s) at a “Meeting” with the client(s).
6. Advisor(s) review all fact-finding materials.
7. Input the fact-finding materials into Money Guide Pro.
8. Put together the plan.
9. Review the upcoming presentation.
10. Present the plan to the client(s) in a “Meeting”.
11. Follow Up with client(s).

Wiggin Financial Planning, P.A. also provides Investment management services on a discretionary basis. Wiggin Financial Planning, P.A. may perform ongoing investment review and portfolio management services and, as such, Wiggin Financial Planning, P.A. is authorized, without prior consultation of the Client, to buy, sell, and trade in stocks, bonds, mutual funds, direct participation programs, other securities and/or contracts relating to the same, and/or other financial/investment products consistent with the Client’s investment objectives. Wiggin Financial Planning, P.A. is authorized to give trade instructions in furtherance of such authority to a registered broker-dealer, other financial institution, and/or the Custodian (see Item 12 for further information regarding Custodian) of the Assets.

Wiggin Financial Planning, P.A. also provides Investment management services. We do not specialize in any particular type of investment service. As of December 2021, we have \$ 16,787,891.00 in discretionary assets under management and \$ 0.00 in non-discretionary regulatory assets under management.

Fees and Compensation

Wiggin Financial Planning, P.A. offers two basic services. Clients may choose one or both services as their needs dictate.

When establishing fees for the services we render, we will be guided primarily by the time and labor required, but also will consider other appropriate factors, such as the novelty and difficulty of the issues involved, the skill required to perform the particular assignment, the fee customarily charged by comparable firms for similar services, the amount of money involved or at risk, and the time constraints imposed either by you or the circumstances. We invite you to discuss freely with us any questions you have concerning a fee charged for this matter. We want our clients to be satisfied with both the quality of our work and the reasonableness of the fees we charge.

For the purpose of this matter our current hourly rate is \$150.00. This rate may change from time to time for the reasons set forth above. We will determine our fee based on our conversation with our client(s) and what we believe to be a reasonable amount of time to finish their financial plan. We will stand by this figure unless there has been a change in the scope of the project.

When preparing a Financial Plan, we expect to be paid a reasonable fee. With respect to this matter, we request a \$450.00 non-refundable retainer. Our invoices are payable when rendered; if our invoice or invoices are not paid when rendered, the firm of WFS will have the right to cease providing any further services.

Wiggin Financial Planning, P.A. will manage a Client's investment portfolio on a discretionary basis for a fee. The investment management fee schedule is based on the value of all assets under management as follows:

Asset Based Fee Schedule

Account Portfolio Value - **Annual Percentage**

- Under \$150,000 - **Negotiable**
- \$150,000 to \$1,999,999 - **1.25%**
- \$2 million to \$2,999,999 - **1.00%**
- \$3 million to \$3,999,999 - **0.75%**
- \$4 million or over - **Negotiable**

Other investment advisers may charge more or less than the fees indicated above.

The investment management fee is negotiable and payable quarterly. Payment is due at the end of three months based on the average monthly balance for the preceding three-month period, and every third month thereafter until the contract is terminated.

Wiggin Financial Planning, P.A. or the client may terminate the agreement in writing 30 days prior to termination. If a client terminates the agreement for the Financial Plan before the plan is finalized, the fees will be prorated according to the time involved.

Wiggin Financial Planning, P.A. does not receive any other compensation from any other source. However, a mutual fund company may have a redemption fee attached if funds are not invested for a minimum amount of time. For example: an international stock mutual fund may require the client to be invested for 3 months; if the funds are withdrawn before this period, a 1% fee may be charged. We are always aware of these fees, and do not invest in such funds unless we have a high degree of certainty that the client's money will be in the fund for at least the minimum time required to avoid any such charges.

Another possible charge may be assessed by our custodian, TD Ameritrade, Inc. (CRD # 7870). If we place a transaction for a stock, a trading fee may be charged at a competitive market rate comparable to discount brokerage fees.

This fee does not go to Wiggin Financial; it is a processing fee which the custodian keeps.

Reports to Clients

TD Ameritrade, Inc. (CRD # 7870) sends clients monthly account statements. We strongly urge every client to carefully review these statements.

Wiggin Financial Planning, P.A. does not send monthly account statements; however, we do send quarterly statements showing the end of quarter balance, plus fees and calculations of fees. We strongly urge a careful review of our quarterly statement and a comparison with the statement sent by TD Ameritrade, Inc. (CRD # 7870) Please immediately notify us of any inaccuracies.

Item 13 - Review of Accounts

Accounts are reviewed quarterly by the President of our Firm, Deborah Wiggin, in addition, Ms. Wiggin is available to review accounts upon clients' request. A quarterly review will be conducted to discuss investments, allocation, financial plan, insurance products and other pertinent areas. There is no minimum number of accounts assigned for the reviewer.

The review process contains each of the following elements:

- Assess client's goals, risk tolerance and objectives;
- Evaluate the strategy which has been employed;
- Monitor the portfolio; and
- Address the need to rebalance.

Additional account reviews may be triggered by any one or more of the following events:

- Change in performance;
- Change in management style of any fund, and
- Change in client's objectives.
- A change in the client's personal circumstances such as an illness, death, birth, divorce, etc.

Non-Periodic Account Reviews

Events that may trigger further client account reviews in addition to the standard quarterly review process may include, but would not be limited to, a notable increase in the volume of requests by the client to effect transactions in his/her accounts, where such transactions may appear to be inconsistent with the client's previously stated investment objectives. Other factors may include requests by the client to liquidate certain securities positions/contracts where such transactions may appear to be inconsistent with the client's previously stated investment objectives. Additional triggering factors could be the performance on an individual account being an outlier to the performance of accounts with similar investment objectives, and a very important trigger would be customer complaints. This last trigger would be a prime example of a trigger for an intermittent review of a client account.

Performance-Based Fees and Side by Side Management

Wiggin Financial Planning, P.A. does not use the fee program called Performance- Based Fees and Side by Side Management.

Types of Clients

Our clients are primarily individuals and small business owners.

The minimum annual fee is negotiable for clients with assets under \$150,000 as described in the section on Fees and Compensation. It is the client's decision whether to pay a minimum fee or not for investment management services. Clients who do not wish to pay a minimum fee may contract for investment advice and initiate their own investment management program outside of Wiggin Financial.

Methods of Analysis, Investment Strategies and Risk of Loss

At the center of our investment approach is diligent research. We use a tactical approach to investment management overlaying strategic asset allocation models. We take a position in an asset class when the asset class is selling at a considerable discount to its fair value giving our clients opportunity for investment success.

Our asset allocation decisions assume a minimum three-year time frame giving us confidence those underlying investment fundamentals, rather than short-term market sentiment, will drive returns. However, we continually review our positions, which occasionally forces changes in the portfolio allocations based on a long-term horizon---most of the time it doesn't.

We believe not only in extensive research but a disciplined investment process which helps us make clear decisions, even in highly stressful and uncertain times.

Client portfolios are based on individual need, risk tolerance and our understanding of the economic environment.

An outgrowth of our value system is our obsession with research and a disciplined investment process. Individual client portfolios may include a wide variety of asset classes and investment vehicles. We buy and sell stocks, bonds, ETFs, and other funds in a tax-efficient manner and by minimizing transaction costs. We use a variant of a core-satellite approach, first considering the macroeconomic environment (e.g., interest rates, stock market) and blending passive and active investment across traditional asset classes (e.g., stocks, bonds, cash) and alternative assets such as REITs, commodities and other actively managed funds. Within each asset class, we choose investments largely based on fundamentals factors affecting the value of the asset —and compare them to prevailing market prices to identify underpriced securities and market segments. The return potential of each client portfolio is matched to his or her tolerance for risk and financial return objectives.

Margin Trading

Wiggin Financial Planning does not participate in margin trading.

Options

Wiggin Financial Planning does not utilize individual option strategies; however, mutual fund managers chosen by WFP may use option strategies.

Disciplinary Information

There has not been any disciplinary action against Wiggin Financial Planning, P.A.

Other Financial Industry Activities and Affiliations

We hold a membership in the national Financial Planning Association (FPA), as well as local membership in the Miami-Dade Chapter of the FPA.

We also are members of the Registered Life Planners Association.

Strategic Partners

Advyzon is a complete practice and portfolio management system for independent financial advisors. This single, all-inclusive platform is designed to support the core aspects of an advisor's practice. It features robust portfolio management and performance reporting, advanced research capabilities, sophisticated investment planning, and intuitive customer relationship management (CRM) tools for batch reporting and secure communications using the Client Web Portal and document vault. Wiggin Financial Planning, P.A. utilizes Advyzon for their daily account management and reconciliation.

It is through Advyzon that Wiggin Financial Planning, P.A. provides Quarterly and End of Year Performance Reports and Quarterly Billing Statements.

Litman/Gregory Company provides Wiggin Financial Planning, P.A. with additional rigorous, independent economic and investment research. This firm has been recognized for the past 11 years by Hulbert Financial Digest Honor Roll for risk adjusted performance in up and down markets. Litman Gregory founded in 1987 is based in Larkspur and Orinda, California. The firm manages over \$6 billion in assets (as of September 30, 2010) and has around 50 employees, including 13 partners.

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

Code of Ethics: Wiggin Financial Planning, P.A. is bound by the Code of Ethics established by the Institute of Certified Financial Planner Practitioners. These principals are intended to aid institute members individually and collectively in maintaining a high level of ethical conduct. They are not laws, but standards by which a member may determine the propriety of conduct in relationships with clients, colleagues, members of allied professions and the public.

We uphold these standards in all our dealings:

Integrity, Objectivity, Fairness and Confidentiality

Members of the firm may buy or sell for their personal or family accounts securities that we have recommended to clients. The personal and family purchases and sales are entered AFTER client transactions are completed for the day. We maintain a ledger showing individual securities transactions by firm employees with a corresponding section showing any client transactions in the same security. This ledger is regularly reviewed by the control person for any conflict of interest. Any personal trading is monitored by our code of ethics requiring that we maintain both integrity and fairness in all our trading practices.

We do not use pooled investment vehicles.

According to Section 69W-600.0131 of the *Florida Administrative Code*, investment advisers will not engage in unethical business practices. Wiggin Financial Planning has established this Code of Ethics which applies to all supervised persons of Wiggin Financial Planning. Persons associated in any manner with Wiggin Financial Planning will be considered supervised persons for the purpose of this Code of Ethics. This Code will be available and distributed to all supervised persons of Wiggin Financial Planning.

An investment adviser is considered a fiduciary under the Advisers Act. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts. In addition, an investment adviser has a duty of utmost good faith to act solely in the best interest of each client. Wiggin Financial Planning and its supervised persons have a fiduciary duty to all clients. As fiduciaries, it is unlawful for Wiggin Financial Planning and its supervised persons to engage in fraud, deceptive or manipulative activities. Wiggin Financial Planning and its supervised persons will act in the client's best interest at all times and will not at any time place their interests ahead of any client's interest. This fiduciary duty is considered the core underlying principle for Wiggin Financial Planning' Code of Ethics and personal trading

policy and represents the expected basis for all supervised persons' dealings with clients of Wiggin Financial Planning.

The anti-fraud provisions of the Advisers Act and federal and state rules and regulations make it unlawful for an investment adviser to directly or indirectly "employ any device, scheme or artifice to defraud a client or a prospective client" or to "engage in any transaction, practice, or course of business which operates as a fraud or deceit upon any client or prospective client." Wiggin Financial Planning requires all of its supervised persons to conduct business with the highest level of ethical standards and to comply with all applicable federal and state securities laws at all times. Deborah F. Wiggin will be responsible for setting standards and internal policies and procedures to ensure that Wiggin Financial Planning and its supervised persons conduct business with the highest level of ethical standards.

Deborah F. Wiggin will be responsible for establishing procedures to prevent and detect any violations of firm or regulatory rules and regulations. In addition, Deborah F. Wiggin will be responsible for establishing and enforcing risk management policies and procedures that are designed to ensure that advisory activities are conducted in accordance with this Code.

Deborah F. Wiggin will also be responsible for making sure that all advisory personnel fully understand Wiggin Financial Planning's policies and procedures and that a review system is established to make sure that these policies and procedures are effective and adhered to by all advisory personnel. All supervised persons will receive a copy of Wiggin Financial Planning's Code of Ethics. Deborah Wiggin will make sure that all supervised persons receive a copy of, understand and agree to comply with Wiggin Financial Planning's Code of Ethics. All supervised persons will sign a written acknowledgement that they have read, understand and agree to comply with Wiggin Financial Planning's Code of Ethics initially upon employment and then each time the Code of Ethics is amended. Additionally, all supervised persons will be required to review this Code of Ethics on an annual basis and will be required to sign an annual acknowledgment. Deborah F. Wiggin will be responsible for notifying all supervised persons of any changes to this Code of Ethics and an updated acknowledgment will be obtained any time changes are made.

Deborah F. Wiggin is responsible for maintaining the Code of Ethics Requests Delivery Log and will record all client requests for and delivery of the Code of Ethics.

Wiggin Financial Planning has the responsibility to make sure that the interests of clients are placed ahead of its or any supervised person's own investment interest. All of Wiggin Financial Planning's supervised persons will conduct business in an honest, ethical and fair manner. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to any services being conducted.

A conflict of interest occurs when a supervised person's private interest interferes with the interests of or the service to Wiggin Financial Planning or any of its clients. Wiggin Financial Planning has the responsibility to avoid all circumstances that might negatively affect or appear to affect its duty of complete loyalty to its clients. No one supervised by Wiggin Financial Planning will engage in any conduct or act, directly, indirectly or through any other person that would be unlawful for such person to do under the provisions of any rules and regulations. If a supervised person is unsure whether a situation would be considered a conflict of interest, the supervised person should consult with Deborah F. Wiggin before taking an action that may result in a conflict of interest.

Wiggin Financial Planning will:

1. Maintain and amend as needed internal standards, policies, procedures and controls to promote compliance with this Code and with other policies and procedures designed to promote each supervised person's fiduciary responsibility.
2. Perform periodic internal and external reviews and audits of the company's standards, policies, procedures and controls.
3. Provide on-going training regarding this Code of Ethics and the company's risk management policies and procedures to all supervised persons.
4. Provide an environment that encourages supervised persons to engage in safe and confidential discussions and disclosures to (Designated Party) or other appropriate senior management person regarding any violations or potential violations to this Code.
5. Establish clear lines of accountability for the company's internal policies and procedures, including provisions relating to the *responsibilities of* employees, officers and directors with appropriate oversight by Deborah F. Wiggin or designated parties.

Any person engaging in an unethical business practice is subject to having his/her license denied, suspended or revoked and employment terminated. The following activities are examples of unethical business practices:

- Forgery
- Embezzlement
- Theft
- Exploitation

- Non-disclosure
- Incomplete disclosure or misstatement of material facts
- Manipulative or deceptive practices
- Aiding or abetting any unethical practices

Wiggin Financial Planning and its supervised persons will not engage in any dishonest or unethical conduct including, but not limited to:

1. Engaging in any act, practice or course of business that is fraudulent, deceptive, or manipulative in contrary to any rules or regulations established by all governing regulatory bodies.
2. Recommending to a client the purchase, sale or exchange of any security without reasonable grounds for believing that the recommendation is suitable for the client based on the information furnished by the client after reasonable inquiry regarding the client's investment objectives, financial situation and needs, and other information that is known by the investment adviser.
3. Recommending unregistered, non-exempt securities or the use of an unlicensed broker/dealer.
4. Using discretionary authority when placing any trade for the purchase or sale of a security on behalf of the client without obtaining written authority from the client prior to a trade being implemented. If discretionary authority relates only to the price at which, or the time when, an order involving a definite amount of a specific security will be executed, written authority is not needed.
5. Recommending or implementing trades in a client's account that excessive in size or frequency with respect to the client's financial resources, investment objectives and the character of the account.
6. Placing an order to purchase or sell a security on behalf of a client upon receiving instructions to do so through a third party, unless a written third-party trading authorization has been previously obtained.
7. Borrowing money or securities from or loaning money or securities to a client.
8. Misrepresenting the qualifications of Wiggin Financial Planning, its investment adviser representatives or any of its supervised persons, the nature of the advisory services offered by Wiggin Financial Planning or the fees to be charged to any advisory client.

9. Failing to disclose to all clients the availability of any fee discounts.
10. Omitting from any written or verbal communication a material fact that would make statements regarding qualifications, services or fees misleading.
11. Providing advice and guaranteeing the client that a gain or no loss will occur as a result of the advice.
12. Providing reports or recommendations to any advisory client prepared by someone other than Wiggin Financial Planning without disclosing that fact to clients. This does not apply to situations where Wiggin Financial Planning uses published research reports or statistical analyses when providing services to clients.
13. Charging fees that are unreasonable relative to the types of services provided the experience and knowledge of the investment adviser representative providing the services, and the sophistication of the client. In addition, disclosure that similar services may be available for lower fees from other advisers must be made to all clients.
14. Failing to disclose material conflicts of interest in relation to the adviser or any of its supervised persons in writing prior to providing services if such information could reasonably cause the advice to be biased and not objective. Some examples include the following:
 - a. Existing compensation arrangements connected with advisory services provided to clients that are in addition to compensation received from clients for the advisory services.
 - b. Acting in the capacity as an investment adviser or investment adviser representative and a registered representative or insurance agent on a transaction where a fee can be charged for advisory services and a commission can be charged for implementing a trade as a result of the advice provided.
15. Publishing, circulating, or distributing any advertisement that has not been approved and that does not comply with the proper regulatory requirements.
16. Limiting a client's options with regard to the pursuit of a civil case or arbitration.
17. Disclosing any confidential information of any client, unless required by law to do so or having received written authorization from the client to do so.
18. Failing to provide the proper disclosure documents (Form ADV Part 2A, 2A Appendix 1 (if applicable) and Part 2B) prior to or at the time of executing a client

agreement for advisory services.

19. Entering into, extending or renewing an agreement for advisory services unless such agreement is in writing.
20. Using contracts that seek to limit or avoid an adviser's liability under the law.
21. Creating any condition, stipulation or provision as part of any advisory client agreement that limits or attempts to limit the liability of Wiggin Financial Planning or any of its supervised persons for willful misconduct or gross negligence.

Personal Securities Transactions

Wiggin Financial Planning and its supervised persons may buy or sell securities or hold a position in securities identical to the securities recommended to clients. It is Wiggin Financial Planning's policy that no supervised person will put his or her interest before a client's. Supervised persons may not trade ahead of any client or trade in a way that would cause the supervised person to obtain a better price than the price a client would obtain. It is the supervised person's responsibility to know which securities are being traded by Wiggin Financial Planning. Supervised persons can consult with Deborah F. Wiggin to determine whether a security is an appropriate purchase or sale by the supervised person. In addition, all supervised persons are prohibited from trading on non-public information and from sharing such information. Wiggin Financial Planning's supervised persons may not invest in an initial public offering ("IPO") or private placements. Wiggin Financial Planning does not allow "short-swing" trading or market timing.

Summarily:

- Prior written approval before access persons can place a personal securities transaction ("pre-clearance").
- Maintenance of lists of issuers of securities that the advisory firm is analyzing or recommending for client transactions, and prohibitions on personal trading in securities of those issuers.
- Maintenance of "restricted lists" of issuers about which the advisory firm has inside information, and prohibitions on any trading (personal or for clients) in securities of those issuers.
- "Blackout periods" when client securities trades are being placed or recommendations are being made and access persons are not permitted to place personal securities transactions.

- Reminders that investment opportunities must be offered first to clients before the adviser or its employees may act on them, and procedures to implement this principle.
- Prohibitions on "short-swing" trading and market timing.
- Requirements to trade only through certain brokers, or limitations on the number of brokerage accounts permitted.
- Requirements to provide the adviser with duplicate trade confirmations and account statements.
- Procedures for assigning new securities analyses to employees whose personal holdings do not present apparent conflicts of interest.

Before a supervised person places a personal trade, the following should be considered:

1. Will the amount or nature of the transaction affect the price or market for the security?
2. Is the transaction likely to harm any client?
3. Is there an appearance or suggestion of impropriety?

Per the requirements of Rule 204A-1 of the Advisers Act, all persons associated with Wiggin Financial Planning who are also considered access persons will be required to report all securities transactions to Deborah F. Wiggin. An access person has been defined by the SEC, under Rule 204A-1(e)(1), as:

- (i) Any of your supervised persons:
 - (A) Who has access to nonpublic information regarding any clients' purchase or sale of securities, or nonpublic information regarding the portfolio holdings of any reportable fund, or
 - (B) Who is involved in making securities recommendations to clients, or who has access to such recommendations that are nonpublic.
- (ii) If providing investment advice is your primary business, all of your directors, officers and partners are presumed to be access persons.

Brokerage Practices

Wiggin Financial Planning, P.A. has selected TD Ameritrade, Inc. (CRD # 7870) as our clearing broker and custodian firm. Wiggin Financial Planning, P.A. has full discretion to purchase securities of all types and amount for all clients and does not receive any benefits (soft dollars) from TD Ameritrade, Inc. (CRD # 7870) for any of these purchases. We also do not receive or use any research information from TD Ameritrade, Inc. (CRD # 7870).

Being a Fee-Only firm, we do not collect any commissions using primarily no-load mutual funds as investment vehicles. While we encourage our clients to have their account(s) with TD Ameritrade, Inc. (CRD # 7870) for ease of management, they are free to use any broker they choose.

Review of Accounts

Wiggin Financial Planning, P.A. reviews each client's account on a quarterly basis to ensure that the asset allocation is still appropriate. Wiggin Financial reviews accounts more frequently if there is a major change in the economy or in a client's personal situation, such as an illness, death, birth, divorce etc... The president of the firm, Deborah Wiggin is the primary person conducting and supervising each client's review.

Clients receive a quarterly performance report from Wiggin Financial. These reports are generated from Advyzo, a service we hired to provide account management and reconciliation, in addition to portfolio performance reports. These reports show our clients the allocation of their portfolios, rates of return of the portfolio year to date and since the inception of the account. In addition, the reports will show the client past performance of the assets held in the portfolio including best and worst years.

Client Referrals and Other Compensation

Wiggin Financial Planning, P.A. does not compensate any person for client referrals.

Custody

Wiggin Financial Planning is deemed to have custody of client's assets in that they have arrangements, including a specific power of attorney, whereby they are authorized by the client to withdraw assets from the client's account held at the custodian, TD Ameritrade, Inc. (CRD # 7870), Wiggin Financial has the ability to deduct fees directly from a fund's or client's account on a quarterly basis.

TD Ameritrade, Inc. (CRD # 7870) sends clients monthly account statements. We strongly urge every client to carefully review these statements.

Example of wording: *“Please carefully review this report against the actual account statement delivered from your qualified custodian. If you are not receiving account statements from the qualified custodian or a missing any account statements, please contact us immediately.”*

Wiggin Financial Planning, P.A. does not send monthly account statements; however, we do send quarterly statements showing the end of quarter balance, plus fees and calculations of fees.

Investment Discretion

Under the terms of our Investment Management contract, Wiggin Financial Planning, P.A. may exercise investment discretion. In order for us to have this discretion, we ask the client to sign a Specific Power of Attorney giving us the right to execute trades on their behalf without having to consult with them before executing trades.

Voting Client Securities

Wiggin Financial Planning, P.A. does not have and will not accept authority to vote client securities. Clients receive their proxies and other solicitations directly from TD Ameritrade, Inc. (CRD # 7870), the custodian. Clients may contact us with any questions by phone, mail or e-mail.

Financial Information

Wiggin Financial Planning, P.A. does have discretionary authority as stated under section “Investment Discretion”, however, we do not collect any fees in advance.

Additional Requirements for State-Registered Advisors

Deborah F. Wiggin is the president of Wiggin Financial Planning, P.A. and is the primary management person. The following is a current biography showing education and business background.

Deborah F. Wiggin does not participate in any other business other than Wiggin Financial Planning, P.A. and does not take performance- based fees.

Deborah F. Wiggin, CFP, RLP

An Investment Advisor
Representative

101 NE Third Ave, Suite 1555
Fort Lauderdale, FL 33301

(954) 390-6191
dwiggin@wigginfo.com

Education

- Certified & Court Appointed Family Mediator 2001
- A Registered Investment Advisor, 1995
- Institute for Certified Divorce Planners, CDFA 1994
- Nova University, MBA 1984
- University of New Hampshire, BA 1971
- Registered Life Planner

Professional Affiliations

- Int'l Assoc. of Certified Financial Planners/ FPA: Miami Chapter
- Board Member of Broward Housing Solutions
- The Institute of Certified Life Planners
- Leadership Board: Class XXV

Work History

Present- President, Wiggin Financial Planning, P.A., Fort Lauderdale, FL General Financial Planning, Pre-Divorce Planning & Financial Planning for Small Businesses

- Analysis of clients' estate in connection with estate, gift & generation skipping tax
- Counsel clients in pre-retirement and post-retirement planning
- Review & development of Investment Portfolios.
- Ongoing Investment management Services
- General Budget Planning with an eye toward clients' goals and objectives
- Education Planning
- Help in achieving a financially fair divorce settlement
- Analysis of appropriate business entity with regards to tax considerations
- Planning & structuring of Employee Benefit Programs
- Assisting clients in developing or reviewing business continuation agreements
- Business Exit Strategies

1992 -2009- President, Miller, Wiggin & Associates, Inc. Fort Lauderdale, FL
General Financial Planning, Pre-Divorce Planning & Financial Planning for Small Businesses

1991-1992- President, Deborah F. Wiggin Financial Services, Inc., Deerfield Beach, FL Fee-Only Financial Planning Firm

1986 -1990- Life Insurance Agent Investment Counselor, Business Benefit Consultant, Mass Mutual life Insurance Company, Fort Lauderdale, FL