



COUTURE FINANCIAL, INC.

Registered Investment Advisor
CRD # 134303

1800 2nd St.
Suite 881
Sarasota, FL 34236

Tel: (941) 366-3551
Fax: (941) 366-3439
Toll-Free: (800) 553-3385
www.couturefinancial.com

Form ADV Part 2A
Firm Brochure
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This brochure provides information about the qualifications and business practices of Couture Financial, Inc. Please contact our firm at (941) 366-3551 if you have any questions about the content of this brochure.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or any state securities administrator. Additional information about Couture Financial, Inc. is available on the SEC's website at www.adviserinfo.sec.gov. Click on the "Investment Adviser Search" link and then search for "Investment Adviser Firm" using the firm's IARD ("CRD") number, which is 134303.

While the firm and its associates may be registered and/or licensed within a particular jurisdiction, that registration and/or licensing in itself does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training on the part of the firm or its associated personnel.



Item 2 - Material Changes

Couture Financial, Inc. amended its June 30, 2022 Form ADV Part 2A firm brochure due to:

- As of, August 24, 2023 Couture Financial had \$31,731,452 under its management: \$31,269,234 on a discretionary basis and \$462,218 not actively managed.
- Additional New regulation from the Department of Labor. In addition to the retirement plan advice and rollovers analysis requirement the Department of Labor has added the requirement to provide an annual report disclosing a summary of all activity related to new retirement accounts added to our clients portfolios. This new regulation is identified as PTE 2020 – 02 disclosure report.

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 at www.adviserinfo.sec.gov, at Couture Financials website at www.couturefinancial.com, or may contact our firm at (941) 366-3551 to request a copy at any time.

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.



Item 3 - Table of Contents

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

Important Information

Throughout this document, Couture Financial, Inc. may be referred to as “the firm,” “firm,” “our,” “we” or “us.” 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 and legal entities. The term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary (i.e., internet address, etc.).



Item 4 - Advisory Business

Couture Financial, Inc. is an investment advisory services firm incorporated in December of 1995 in the State of Florida (formerly known as Couture & Associates Financial Services, Inc.). We may operate under the trade name Couture Financial. It is a state registered investment advisor located in Florida. Investment Adviser Registration Depository (IARD) number 134303. The firm maintains its primary investment advisory registration with the State of Florida Office of Financial Regulation. Phillip Couture, CFP® is the principal owner, President and Chief Compliance Officer. M Lance Couture serves as Vice President and Compliance Officer. The firm also provides services for clients in a number of additional states under the de minimis rules in federal regulations.

The firm provides customized investment management services for clients in accordance to their goals, objectives, and risk tolerance primarily through mutual funds, stocks, bonds, exchange-traded funds (ETFs), alternative assets like real estate investment trusts (REIT), or subaccounts within variable annuity and variable life programs. We utilize these types of investments as they provide broader asset diversification, and allow the ability to control market volatility risk and the potential for outperformance. Our firm does not offer an investment program involving wrapped (bundled) fees.

The client has the right to exclude certain securities (e.g., options, stocks, etc.) at their discretion. The firm manages portfolios on a discretionary or nondiscretionary basis (defined in Item 16). It will remain the client's responsibility to notify our firm promptly if there are changes in their financial situation and/or investment objectives for the purpose of reviewing, evaluating, or revising previous account restrictions or firm investment recommendations.

We may recommend the engagement of an institutional investment manager (sub-advisor) to serve the client's portfolio. Prior to recommending a sub-advisor, we will ensure the sub-advisor is registered or notice-filed within the client's state of residence. Clients may be required to maintain a minimum account size to be eligible for this service, and certain sub-advisors may require a higher asset-level to invest in their program. Our firm will inform the client in advance of minimum investment criteria.

Couture Financial also provides various financial planning services to its clients. The available services include but are not limited to tax planning, retirement evaluation and planning, estate planning, insurance evaluation. Prior to engaging Couture Financial for financial planning, the Client will be required to enter into a financial planning contract with Couture Financial setting forth the terms and conditions of the engagement describing the scope of the services provided.

As of June 30, 2023, Couture Financial had \$31,731,452 under its management: \$31,204,234 on a discretionary basis and \$462,218 not actively managed.

Retirement Plan Advice and Rollovers

As a registered investment adviser, our firm is a fiduciary to every client, meaning that we are obligated to act in our clients' best interests at all times. In addition to our fiduciary status as an investment adviser firm, when our firm provides advice to retirement investors, such as advice on an employer-sponsored retirement



plan, Individual Retirement Account (IRA) or other qualified retirement plan, we may also be considered by the Department of Labor and the Internal Revenue Service to be acting as a fiduciary under Title I of ERISA and the Internal Revenue Code. These fiduciary obligations include requirements that we disclose our services and fees, conflicts of interest, and the reasons our recommendations are in the client's best interests.

After an analysis of the client's situation and plan documents, we will consider relevant factors including but not limited to the following:

- Alternatives to rolling the employer plan to an IRA, including leaving the money in an employer's retirement plan (if permitted); rolling the money to a new employer plan if available; or cashing out;
- The fees and expenses associated with both the employer's plan and the rollover IRA (or other alternatives such as noted above) and whether the employer currently pays for some or all of the plan's expenses;
- The different levels of services and investments available under the employer plan and the rollover IRA, and other alternatives;
- Evidence that a rollover is the most appropriate choice in light of any additional costs and the resultant decrease in the client's returns;
- How withdrawals are treated under each alternative (e.g., penalties up to age 55 vs. 59-1/2);
- Protection from creditors and legal judgments (unlimited vs. bankruptcy only; federal- and state-specific);
- Required minimum distributions;
- Tax implications of rolling shares of employer stock;
- The impact of economically significant investment features such as surrender schedules and index annuity cap and participation rates (such as in an employer-sponsored 403(b) plan account);
- Any other relevant variables particular to the client's situation.

The client will be made aware of conflicts of interest including but not limited to whether our firm will profit from a recommendation through financial planning and/or investment management fees, and whether services we offer are already provided by or available through the current plan, potentially at no additional cost.

Item 5 - Fees and Compensation

Couture Financial is compensated for advisory services as a percentage of total assets under management in accordance with the following schedule:

Account Value	Annualized Fee	Quarterly Fee
\$100,000 to \$250,000	1.75%	0.438%
Next \$250,000	1.50%	0.375%
Next \$500,000	1.25%	0.313%
Next \$2,500,000	1.0%	0.25%
Above \$3,500,000	0.90%	0.225%



If a sub-advisor is engaged to execute its investment strategy within the client account maintained at our custodian of record, the sub-advisor's fee is incorporated into the fee as noted above. Advisory fees are negotiable and the advisor is authorized to collect fees quarterly in advance, and immediately when new capital is added. These fees may be higher or lower than fees charged by other advisors for comparable services depending on the type of services provided, the experience and expertise of the advisor, as well as the sophistication and bargaining power of the client. If the account is placed under our management mid quarter, our firm is authorized to collect a prorated amount to cover fees through the end of the current management period. Fees are deducted directly from client's account (unless separate billing is requested) based on account values as of the previous calendar quarter for all invested assets under management related to the firm's investment management agreement.

Couture Financial will concurrently send the client and custodian of record a written invoice each billing period that describes the advisory fees to be deducted from the account. The invoice will include the total fee assessed, covered time period, calculation formula utilized, and reference to the assets under management on which the fee had been based. The firm encourages clients to verify the accuracy of fee calculations; the custodian may not verify the accuracy of advisory fee assessments for each account or on a consistent basis. Fees are negotiable.

The client's written authorization is required in order for the custodian of record to deduct advisory fees from an account. By signing the firm's engagement agreement, as well as custodian account opening documents, the client will be authorizing the custodian to withdraw both advisory fees and any transactional and/or custodial fees from the account. Deducted fees will be noted on account statements that the client receives directly from their custodian of record. Periodic account value variances between the firm's invoice and custodian statement (beyond the firm's control) may occur due to late trade settlement, dividend distribution, etc., requiring adjusted transaction reporting from the custodian of record.

A client that terminates the management agreement in writing may request a refund of unearned advisory fees by sending a written request to Couture Financial's home office. Refunds are determined by calculating the remaining days before the end of the quarter subject by the date on which the written request is received.

Consideration for accounts less than \$100,000 will be evaluated on a case-by-case basis. All fees listed above are annualized and billings are a proportionate share of total and billed quarterly.

A non-recurring establishment fee of \$250 to cover the costs of necessary documentation and establishment of accounts and tracking with the appropriate investment and custodian companies shall be payable during the initial contracting and account selection. A fee from \$50 to \$250 may be charged for processing of full termination.

Financial Planning Services

Couture Financial's financial planning services can be contracted for on an hourly basis at the rate of \$250.00 per hour for advisor time and \$125.00 per hour for staff time. Fees are negotiable.

Associate and staff time, including phone conversations in excess of ten minutes, may be billed in ten-minute increments. The associate is responsible for maintaining an accountability record of fees and expenses for billing purposes. Fees and expenses will be itemized and are due and payable within fifteen days of the invoice date. An estimate of costs for additional advisory services will be provided for the client's approval prior to execution. These fees may be higher or lower than fees charged by other advisors for



comparable services depending on the type of services provided, the experience and expertise of the advisor, as well as the sophistication and bargaining power of the client.

Special Notes

Our firm does not charge or receive a commission or a mark-up on securities transactions, nor will the firm or an associate be paid a commission on the purchase of a securities holding that is recommended to a client. Clients have the right to purchase investment products that we may recommend that are not part of the managed portfolio through other investment organizations not affiliated with us.

Only “approved” stocks, bonds, ETFs, mutual funds and investment companies or existing client account assets that meet appropriate Couture Financial requirements will be acceptable for our management service. The strategic allocation methodology is available for those situations that do not allow more frequent allocation adjustments. However, we utilize the “tactical” approach as the preferred choice. In addition to stronger control of the portfolio volatility risk factors, more frequent account adjustments may provide greater profit potential.

All investment and insurance companies pay a management fee to their respective managers. Many of these companies charge Rule 12b-1 or similar fees. These fees are deducted from the net asset or unit value of the fund or sub-account. Such fees paid by a fund or sub-account managed pursuant to this agreement shall be an indirect expense to the managed account to cover custodial expenses. Couture Financial does not receive “trailer” or SEC Rule 12b-1 fees.

When there is the potential for the receipt of a commission and other compensation via an insurance product transaction (e.g., fixed annuity, life insurance policy, etc.), an associate who is licensed as an insurance agent has an incentive to make such a recommendation based on the compensation they may receive rather than a client’s needs. Our advisory firm and its associates take their responsibilities seriously and only intend to recommend investments, insurance, or advisory services we believe appropriate for each client. Please refer to Items 10 and 11 of this firm brochure, in addition to Item 4 of the associate’s brochure supplement for details.

Additional information about firm fees in relationship to brokerage practices is noted in Item 12.

Our engagement remains in effect until terminated by client or our firm. A client may terminate our agreement within five business days after the date of entering into the contract, and either party may terminate the contract upon delivering 30-day written notice to the other party. In the event of such a termination, the fee for the terminal period will be prorated based on the last valuation of assets submitted to the client, and any unearned portion may be refundable. There will not be a refund of any initial setup fee except that these charges are refundable without penalty within the first five business days after the agreement becomes effective. A termination fee, ranging from \$50 to \$250, may be charged to cover our firm’s costs to discontinue management. We reserve the right to terminate our agreement without notice in the event that timely payment of fees is not made by a client.

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

Couture Financial does not accept performance-based fee accounts. (e.g., fees based on a share of capital gains on or capital appreciation of assets in a client’s account). Our fees will not be based on side-by-side management, which refers to a firm simultaneously managing accounts that do pay performance-based fees (such as a hedge fund) and those that do not.



Item 7 - Types of Clients

While Couture Financial's current client-base consists of individuals and high net worth individuals, we are available to serve trusts, estates, foundations and charitable organizations, as well as corporations and their retirement plans. Couture Financial suggests an initial minimum account size of \$100,000.

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

Three factors influence the performance of a mutual fund:

- **The fund manager.** Are the fund's management and research team good at identifying investments with the potential to excel?
- **The fund's directive.** There are times when a fund, regardless of the skill of the manager, will lag other investment sectors as a result of the business cycle, the mood of the market towards its area of investment, or other reasons.
- **Overall direction of the market.** In a severe market downturn, few if any investments are safe from loss.

Our investment approach addresses those factors by:

- **Using fundamental and technical analysis** to identify stocks, bonds, ETFs, and no-load or load-waived mutual funds with managers who have strong track records as superior individual investment pickers.
- **Allocating client funds** among these various assets with investment objectives that our indicators identify to exhibit the best potential for gain given current market circumstances. To do so, we monitor the performance of the selected investments on an ongoing basis to assure that they continue to excel with the knowledge that new opportunities are waiting on the sidelines should an asset or sector begin to lag expectations.
- **Determining, through daily monitoring** of proprietary market indicators and independent market analysis, when market conditions appear to support rising values and invest accordingly. If the market conditions appear to be deteriorating, client assets are moved incrementally to the protection of a money market fund or alternative investment categories.

By investing client assets in carefully selected stocks, bonds, ETFs, and mutual funds with managers who appear to have exceptional investment selection skills, Couture Financial's goal is to outperform market indices and index funds designed to mirror those indices. However, even the best managers have been unable to avoid losses when the market or the industry sector in which the assets are focused encounters a major decline. There are times when cash is the best investment. This is where Couture Financial's technical market analysis comes into play. Client positions are trimmed back when market conditions appear to be unfavorable for gains and may reach up to 100% cash in severe downturns.

Past performance is not indicative of future results. Different types of investments carry varying degrees of risk. Investing in securities involves risk of loss that clients should be prepared to bear. Clients should never assume that future performance of any specific investment or investment strategy will be profitable.

We have offered examples of risk in the following paragraphs, and we believe it is important that our clients review and consider each prior to investing.



Active Management

A portfolio that employs active management strategies (e.g., tactical trading) may, at times, outperform or underperform various benchmarks or other strategies. In an effort to meet or surpass these benchmarks, active portfolio management may require more frequent trading or “turnover.” This may result in shorter holding periods, higher transactional costs, and/or taxable events generally borne by the client, thereby potentially reducing or negating certain benefits of active asset management.

Company Risk

When investing in securities, such as stocks, there always is a certain level of company or industry-specific risk inherent in each company or issuer. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as *unsystematic risk* and can be reduced or mitigated through diversification.

Equity (Stock) Risk

Common stocks are susceptible to general stock market fluctuations and to volatile increases or decreases in value as market confidence in and perceptions of their issuers change. If an investor held common stock or common stock equivalents of any given issuer, they may be exposed to greater risk than if they held preferred stocks and debt obligations of the issuer.

ETF and Mutual Fund Risks

The risk of owning ETFs and mutual funds reflect their underlying securities (e.g., stocks, bonds, derivatives, etc.). These forms of securities typically carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. Certain ETFs and indexed funds have the potential to be affected by “active risk” or “tracking error risk,” or a deviation from a stated index (e.g., S&P 500). While many ETFs and index mutual funds are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are asset classes within these investment vehicles or holding periods within that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be a holding within an ETF or mutual fund), may be considered “non-qualified” under certain tax code provisions.

Failure to Implement

As a financial planning client, you are free to accept or reject any or all of the recommendations made to you. While no advisory firm can guarantee future performance, no plan can succeed if it is not implemented. Clients who choose not to take the steps recommended in their financial plan may face an increased risk that their stated goals and objectives will not be achieved.

Financial Risk

Excessive borrowing to finance a business operation increases profitability risk because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Fixed Income Risks

Various forms of fixed income instruments, such as bonds, money market, or bond funds may be affected by various forms of risk, including:



Credit Risk

The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as “default risk.” Credit risk may also occur when an issuer’s ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as funds or ETF share values that hold these issues. Bondholders are creditors of an issuer and have priority to assets before equity holders (i.e., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.

Duration Risk

Duration is a measure of a bond’s volatility, expressed in years to be repaid by its internal cash flow (interest payments). Bonds with longer durations carry more risk and have higher price volatility than bonds with shorter durations.

Interest Rate Risk

The risk that the value of the fixed income holding will decrease because of an increase in interest rates.

Liquidity Risk

The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income are generally liquid (i.e., bonds), there are risks which may occur such as when an issue trading in any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price.

Reinvestment Risk

With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

Fundamental Analysis

The challenge involving fundamental analyses is that information obtained may be incorrect; the analysis may not provide an accurate estimate of earnings, which may be the basis for a security’s value. If a security’s price adjusts rapidly to new information, a fundamental analysis may result in unfavorable performance.

Inflation Risk

Also called purchasing power risk, is the chance that the cash flows from an investment won’t be worth as much in the future because of changes in purchasing power due to inflation.

Market Risk

When the stock market as a whole or an industry as a whole fall, it can cause the prices of individual stocks to fall indiscriminately. This is also called *systemic* or *systematic* risk.



Passive Investing

A portfolio that employs a passive, efficient markets approach has the risk of generating lower-than-expected returns due to its broad diversification when compared to a portfolio more narrowly focused.

Political Risk

The risk of financial and market loss because of political decisions or disruptions in a particular country or region; also, may be known as "geopolitical risk."

Research Data

When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. While our firm makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice on or investment management of an account.

Technical Analysis

The risk of investing based on technical analysis is that it may not consistently predict a future price movement; the current price of a security may reflect all known information. Further, a particular change in the market price of a security may follow a random pattern and may not be as predictable as desired. This may occur due to analyst bias or misinterpretation, a sector analysis error, late recognition of a trend, etc.

Item 9 - Disciplinary Information

On June 13, 2016, Couture Financial was the subject of regulatory action from the State of Florida Office of Financial Regulation for (1) not timely filing of an amendment to Form ADV involving recommendations to a former broker/dealer that staff had in the past been associated; (2) not timely filing of a financial matter via Form U-4 involving a member of firm management; and (3) having retirement plan participant account access information for a small number of advisory firm clients, subsequently triggering regulatory reporting and net capital requirements per state custody rules. The firm amended its disclosure documents and business practices as prescribed and paid a \$20,000 administrative fine to the State of Florida.

Item 10 - Other Financial Industry Activities and Affiliations

Our advisory firm and its management are not registered nor have an application pending to register as a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) member firm or associated person of such a firm, nor are we required to be registered with such entities. Neither our firm nor its management is or has a material relationship with any of the following types of entities:

- accounting firm or accountant
- another financial planning firm
- bank, credit union or thrift institution, or their separately identifiable departments or divisions
- lawyer or law firm
- another pension consultant



- real estate broker or dealer
- sponsor or syndicator of limited partnerships
- trust company
- an issuer of a security, to include an 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)

Associated persons of Couture Financial maybe be licensed insurance agents, appointed with various unaffiliated insurance carriers via our firm, which is also an independent Florida insurance agency. Further information with regard to these other activities may be found in each associate’s accompanying Form ADV Part 2B brochure supplement. Whether they are serving a client in one or more capacities, an associate will disclose in advance how they are being compensated and if there is a conflict of interest involving any advice or service he may provide. At no time will there be tying between business practices and/or services; a condition where a client or prospective client would be required to accept one product or service that is conditional upon the selection of a second, distinctive tied product or service. The client is under no obligation to purchase an insurance product through an associate of Couture Financial, Inc. and is free to choose the sources through which to implement a recommendation.

The external portfolio managers (sub-advisors) that we may recommend to you are required to be registered as an investment advisor. As referenced in Item 5 of this brochure, each firm is compensated for their respective services by the client through a portion of the advisory fee that is assessed. We have an incentive to recommend one external portfolio manager over another if less favorable compensation or services arrangements were to be offered to us by another external portfolio manager. In light of this conflict of interest, we will review our recommendations and “mix of business” based on the client’s needs, goals and objectives with respect to all of our portfolio management offerings. There is also the potential for clients’ fees assessed via these engagements to be higher than had a client obtained them directly from the external portfolio manager or the client were able to purchase similar underlying investments on their own. Clients are encouraged to review all of our offerings and their stated fees prior to the engagement, and each client has the right to purchase recommended or similar investments through their own provider. It should be noted that certain external portfolio managers and/or underlying investments may not be available to self-directed investors or at the same cost.

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

Couture Financial has adopted a Code of Ethics that will apply to all our employees, associates, and access or supervised persons. This Code of Ethics is based on ethical conduct premised on fundamental principles of openness, integrity, honesty, and trust. The Code of Ethics describes our standards of business conduct, compliance with federal and state securities laws, as well as our fiduciary duty to our client. As a fiduciary, it is an investment adviser’s responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of our clients at all times. This Code of Ethics also covers our Insider Trading and Personal Securities Transactions Policies and Procedures designed to prevent the misuse of material non-public information by Couture Financial or any person.

All employees, associates, access, or supervised persons are required to sign an acknowledgement that they have read, understand, and agree to comply with Couture Financial’s Code of Ethics as well as provide securities holdings and personal securities transactions reports to the Chief Compliance Officer for review.

A copy of our Code of Ethics is available, free of charge, to any client or prospective client upon request.



At times, Couture Financial and/or its access persons may take positions in the same securities as clients. This creates a potential conflict of interest. It is the express policy of Couture Financial that all access and supervised persons with the firm must place the interests of our clients ahead of their own when implementing personal investments. As such, we will strive to avoid conflicts with our clients by effecting personal trades on a “last in” and “last out” basis when trading occurs in close proximity to client trades. Should a conflict occur because of materiality (i.e., a thinly traded stock), disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (i.e., purchase or sale which is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price), will not be disclosed at the time of trading.

Item 12 - Brokerage Practices

Best execution has been defined by the SEC as the “execution of securities transactions for clients in such a manner that the client’s total cost or proceeds in each transaction is the most favorable under the circumstances.” Best execution applies to the circumstances of each particular transaction.

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker dealer services, including among others, the value of research provided, client service and responsiveness, familiarity and financial strength. Couture Financial does not normally recommend or transact the purchase of individual securities for clients. Our portfolio management services are primarily structured around the use of ETFs, mutual funds, and/or similar investment vehicles. As a result, much of our trading activity occurs with an end of day market price.

As a fiduciary and based on the needs of each client’s portfolio situation, Couture Financial recommends that investment management clients maintain their accounts with Equity Trust Company. Our firm is independently owned and operated; we are not legally affiliated with Equity Trust Company. While we recommend Equity Trust Company as custodian of record, the client will decide whether to do so and will open their account in their name with the custodian by entering into an agreement directly with them. We do not technically open the account for a client but we will assist the client in doing so. If a client does not wish to place their assets with Equity Trust Company as the custodian of record, we may be able to serve as investment advisor with another custodian of the client’s choice if the other custodian’s policies allow us to do so. We do not receive referrals from our custodian, nor are client referrals a factor in our selection of our custodian.

Our internal policy and operational relationship with our primary custodian requires client accounts maintained there to execute trades per their order routing requirements. We do not direct which executing broker should be selected for client account trades; whether that is an affiliate of our preferred custodian or another executing broker of our custodian’s choice. As a result, the client may pay higher transaction costs, experience greater spreads, or receive less favorable net prices on transactions than might otherwise be the case. Note that we are not compensated for trade routing/order flow, nor are we paid commissions on such trades. We do not receive interest on an account’s cash balance.

For accounts maintained at a custodian of the client’s choice (e.g., held-away accounts), the client may choose to request that a particular broker is used to execute some or all account transactions. Under these circumstances, the client will be responsible for negotiating, in advance of each trade, the terms and/or arrangements involving their account with that broker, and whether the selected broker is affiliated with their custodian of record or not. We will not be obligated to seek better execution services or prices from these other brokers, and we will be unable to aggregate transactions for execution via our custodian with



other orders for accounts managed by our firm. As a result, the client may pay higher commissions or other transaction costs, potentially experience greater spreads, or receive less favorable net prices on transactions for their account than would otherwise be the case.

While Couture Financial may receive access to investment research through our association with Equity Trust Company, we do not receive soft dollars (an economic benefit received such as research from a brokerage firm for executing trades through that broker). Since Couture Financial only occasionally utilizes the purchase of individual securities (stocks or bonds), we do not aggregate orders or block trade. The costs associated with not aggregating orders are not applicable for our type of investment strategy.

Item 13 - Review of Accounts

Client accounts will be reviewed by Couture Financial staff on an annual, semi-annual, quarterly, or monthly basis as required due to the client's situation or according to the terms of the advisory contract. The scope of the review will be limited to aspects of the client's situation requiring attention at that time (e.g., investment portfolio, insurance policy, estate planning, etc.) and based on the specific services that the client has contracted.

Retirement Planning clients will receive periodic reviews when requested to identify specific areas of needed adjustment. Written reports will be provided as needed with recommended strategy changes. The reports will encompass only the financial aspects currently being reviewed. CFI does not currently provide full base financial planning for clients.

Managed investment portfolios will receive from us a full quarterly reconciliation of activity and performance report. Our performance reports are calculated using time-weighted methodologies that are reviewed by staff prior to delivery. The reports are intended to inform clients about investment performance over the current period, as well as over the longer term since the account's inception. Clients are urged to carefully review and compare account statements that they have received directly from their custodian of record with any report they may receive from our firm or any other source that contains account performance information.

It is the responsibility of the client to notify Couture Financial promptly if there are any current or anticipated changes in their financial situation, investment objective, or risk tolerance. Clients may call in at any time during normal business hours to discuss directly with the investment advisor about their client account, financial situation, or investment needs. Additionally, Couture Financial shall not be required to verify any information received or omitted from the client or from the client's other professionals. The client retains absolute discretion over all investment implementation decisions and is free to accept or reject any recommendation made by Couture Financial.

Couture Financial requires that any change of address for client accounts must be accomplished with a signed statement received from the client.

Item 14 - Client Referrals and Other Compensation

If a client is introduced to our firm by an unaffiliated solicitor, we may pay the solicitor a fee in accordance with the requirements set forth in securities statutes that will be determined by the state in which the client and solicitor reside. Any such referral fee shall be paid by the firm and shall not result in additional advisory fees assessed to the account holder. The solicitor will disclose the nature of their relationship with the firm to prospective client at the time of solicitation. The solicitor will provide the prospective client with our firm's Form ADV Part 2A brochure as well as a disclosure document that contains the terms and conditions



of the solicitation arrangement, including compensation that may be received. Couture Financial does not act as a solicitor to other investment advisors.

Couture Financial occasionally sends a person (usually an existing client) a small “thank you” gift within regulatory guidelines when someone is referred to us and that person chooses to hire our firm. Since this gives the appearance of a conflict of interest by providing an incentive to clients, Couture Financial will record and review all gifts sent to ensure compliance with regulatory guidelines.

Item 15 - Custody

Couture Financial, Inc. does not have physical custody of client funds and/or securities. We have “constructive custody” of the client accounts since we may request the withdrawal of advisory fees from an account. We will only do so through the engagement of a qualified custodian maintaining the client assets, via the client’s prior written approval, and following our delivery of our written notice. Couture Financial notifies the client in writing of the qualified custodian’s name, address, and the manner in which the funds or securities are maintained.

Account statements are sent at least quarterly by the qualified custodian. These statements identify the amount of funds, each security, and all transactions in the account for the period. Couture Financial receives copies of client statements directly from the custodian and maintains those records for periodic review.

We restrict an associate from serving as trustee or having general power of attorney over a client account.

We are not authorized to accept and forward client securities (i.e., stock certificates) erroneously delivered to our firm.

We do not collect advance fees of \$500 or more for services that are to be performed six months or more into the future.

Couture Financial sends quarterly portfolio evaluation reports to all actively managed client accounts. Clients are urged to compare the account statements they receive from the qualified custodian with those they receive from us.

Item 16 - Investment Discretion

When opening an account for investment advisory services apart from financial planning services, Couture Financial requires that each advisory client sign a limited power of attorney that authorizes our firm discretion over the management of their account, subject to the investment parameters designated by the client and Couture Financial to meet the client’s investment objectives. We exercise discretion over the securities to be bought or sold and the amount of securities purchased or sold. This authority does not permit full/general power of attorney and will not allow withdrawals of client funds or securities, other than advisory fees when included in the client agreement. In addition, clients may impose reasonable limitations or restrictions on the discretionary power granted so long as the limitations or restrictions are specifically set forth or included as an attachment to the client agreement. Couture Financial will be instructed to continue full management of client accounts in the event of death or disability until alternative instructions are received from the executor, conservator, or alternative trustee.



Item 17 - Voting Client Securities

Clients will receive proxies or other solicitation directly from their custodian or transfer agent. Couture Financial does not have any authority to vote proxies on behalf of managed client accounts, to include those accounts served on a discretionary basis. These clients retain the responsibility for receiving and voting proxies for any and all securities maintained in their portfolio. Clients may contact Couture Financial with questions about their particular proxy solicitation.

Item 18 - Financial Information

Under certain circumstances, registered investment advisors are required to provide you with financial information or disclosures about their financial condition. Since Couture Financial does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance, nor do we take physical control of a client account, we are not required to include a balance sheet for our most recent fiscal year.

Neither our firm nor its management serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

Our firm accepted a small Paycheck Protection Program (PPP) loan through the COVID-19 provisions of the CARES Act. It has not affected our financial strength and was initiated to provide extra safety for our ability to serve our clients with excellence.

We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Couture Financial has not been the subject of a bankruptcy petition at any time.

Item 19 - Requirements for State-Registered Advisers

For further information involving firm principal executive and management personnel, their business activities as well as material conflicts of interest, please refer to areas previously disclosed in Items 6 and 9 through 11, as well as the accompanying Form ADV Part 2B brochure supplement that immediately follows this page. In consonance with Item 10 of this brochure, neither our firm nor a member of its management has a material relationship with the issuer of a security.





COUTURE FINANCIAL, INC.

Registered Investment Advisor
CRD # 134303

1800 2nd St.
Suite 881
Sarasota, FL 34236

Tel: (941) 366-3551
Fax: (941) 366-3439
Toll-Free: (800) 553-3385
www.couturefinancial.com

Phillip Q. Couture, CFP®
President/Chief Compliance Officer
Investment Advisor Representative
CRD # 734399

Form ADV Part 2B
Brochure Supplement
August 24, 2023

This brochure provides information about Phillip Q. Couture that supplements Couture Financial, Inc. Form ADV Part 2A firm brochure. You should have received a copy of that brochure. Please contact our firm at (941) 366-3551 if you did not receive the full brochure or if you have any questions about the contents of this supplement. Additional information about Phillip Q. Couture is available on the Securities and Exchange Commission's (SEC) website at www.adviserinfo.sec.gov.



Item 2 - Educational Background and Business Experience

Regulatory guidance requires the firm to disclose relevant post-secondary education and professional training for each principal executive and associate of the firm, as well as their business experience for at least the most recent five years.

Principal Executive Officers and Management Persons

President/Chief Compliance Officer/Investment Advisor Representative

Phillip (Phil) Quinn Couture

Year of Birth: 1946 / CRD Number: 734399

Educational Background and Business Experience

Education

Clayton University - Bachelors of Science in Finance (1989)

El Camino College - Undergraduate Studies in Finance (1966 - 1970)

Harbor College - Undergraduate Studies in Finance (1968 – 1969)

National Social Security Advisor – Certificate Holder (2016 – Present)

Business Background

Couture Financial, Inc. - President/Chief Compliance Officer (06/1977 - Present)

Mercury Securities, LLC - Registered Representative (12/2014 - 09/2015)

Calton and Associates - Registered Representative (01/2009 - 12/2014)

Sigma Financial Corporation - Registered Representative (02/1995 - 12/2008)

Associations and Memberships

Financial Planning Association of the Suncoast - Treasurer (01/2000 – 03/2019): The Financial Planning Association (FPA®) is the largest membership organization for personal financial planning experts in the U.S. and includes professionals from all backgrounds and business models.

National Association of Active Investment Managers - Member (03/1998 - Present): The National Association of Active Investment Managers (NAAIM) was formed in 1989 as a non-profit association of registered investment advisors who provide active money management services to their clients, in order to produce favorable risk-adjusted returns as an alternative to more passive, buy and hold strategies.

South Manatee Business Coalition - Member/Board of Directors (10/2011 - 12/2014): The South Manatee Business Coalition seeks to unite the Manatee and Sarasota business community in pursuit of economic prosperity and future growth. This Association has ceased operations as of January 1, 2015 and the board of directors was disbanded.

Sarasota Yacht Club - Member/Board of Directors (10/2005 – 10/2016): Phil Couture became a member of the Sarasota Yacht Club in 2003 and has served the club in various capacities, including three years as treasurer. He served in a continuous position as Fleet Captain for the club for six years ending September 30, 2016.

Fruitville Business Park Condominium Association - Treasurer (08/2004 – 03/2019): Couture Financial purchased their suite in this business park in 2004. Phil Couture has served continuously, as Treasurer for this association until March 2019.



Adult Financial Education

Phil Couture, CFP® has been teaching adult financial educational classes and seminars (and may continue in the future) at various locations throughout the community of Sarasota, Florida. The focus of these classes is assisting individuals to develop adequate planning for their retirement. Phil Couture is a National Social Security Advisor Certificate holder.

Certifications and Industry Examination

College of Financial Planning, Certified Financial Planner, CFP® - 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.

FINRA Series 7/General Securities Representative (Inactive): Administered by the Financial Industry Regulatory Authority, 250 multiple-choice questions - administered in two parts of 125 questions each; 3 hours testing time for each part. This registration qualifies a candidate for the solicitation, purchase, and/or sale of all securities products, including corporate securities, municipal securities, municipal fund securities, options, direct participation programs, investment company products, and variable contracts.

FINRA Series 24/General Securities Principal (Inactive): Administered by the Financial Industry Regulatory Authority, 150 multiple-choice questions, and 3 hours and 30 minutes testing time. This examination qualifies individuals required to register as general securities principals in order to manage or supervise the



member's investment banking or securities business for corporate securities, direct participation programs, and investment company products/variable contracts.

FINRA Series 27/Financial and Operations Principal (Inactive): Administered by the Financial Industry Regulatory Authority, 145 multiple-choice questions, and 3 hours and 30 minutes testing time. The Series 27 is designed to test a candidate's knowledge and understanding of financial responsibility rules and recordkeeping requirements.

NASAA Series 63/Uniform Securities Agent State Law Examination: This is a 60 multiple-choice questions, and 1 hour and 15 minutes testing time. The Series 63 is designed to qualify candidates as securities agents. The examination covers the principles of state securities regulation reflected in the Uniform Securities Act.

Life, Disability, & Variable Annuity Insurance License: Administered by the Florida Department of Financial Services, completion of 40 hours of approved insurance course for life, health, and variable annuity insurance along with 100 multiple-choice questions; 2 hours testing time. This insurance license is designed to qualify an individual representing an insurer as to life insurance and annuity contracts, including agents appointed to transact life insurance, fixed-dollar annuity contracts, or variable contracts by the same insurer. Annuity contracts, including, but not limited to, fixed or variable annuity contracts; the granting of endowment benefits, additional benefits in event of death or dismemberment by accident or accidental means, additional benefits in event of the insured's disability; and optional modes of settlement of proceeds of life insurance.

NOTE: Financial Industry Regulatory Authority (FINRA), North American Securities Administrator Association (NASAA) and state insurance examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of a securities or insurance industry examination does not constitute or imply a person is "approved" or "endorsed" by a securities regulatory organization, or state securities and/or insurance commissioner.

Former Notable Accolades

- Instructor of Money Management and Financial Planning classes at Orange Coast, Irvine Valley, and Chapman Colleges in CA.
- Instructor of Investment Evaluation - Sierra University, CA.
- Member of Advisory Board for Chapman College Financial Planner Certification Program.
- Vice President of Continuing Education for Sarasota Chapter of International Association for Financial Planning.

Item 3 - Disciplinary Information

Registered investment advisors are required to disclose certain material facts about its associated personnel regarding any legal or disciplinary events, including criminal or civil action in a domestic, foreign or military court, or any proceeding before a state, federal or foreign regulatory agency, self-regulatory organization, or suspension or sanction by a professional association for violation of its conduct rules, that would be material to your evaluation of each officer or a supervised person providing investment advice. Phil Couture has not been the subject of any such event.

Item 4 - Other Business Activities Investment advisor representatives are required to disclose outside business activities that account for a significant portion of their time or income, or that may present a conflict of interest with their advisory activities.



Phil Couture 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. He does not receive commissions, bonuses or other compensation based on the sale of securities, including that as a registered representative of a broker/dealer or the distribution or service ("trail") fees from the sale of mutual funds.

Phil Couture is a licensed insurance agent and is able to sell annuities, life, health, and long-term care coverage to interested parties through various unaffiliated insurance companies where he may receive a commission or agency overrides from the issuer on a client's purchase of the insurance contract. This activity involves 10% or less of his time during and after traditional business hours each month. He may therefore perform in the role as insurance agent or investment advisor representative, and will disclose in advance of a transaction or advisory agreement the capacity in which he is serving a client, to include the conflict of interest the role or service to be provided may incur. The potential for the receipt of commissions and other compensation creates an incentive to make recommendations based on the compensation rather than client need. Phil Couture and our advisory firm take their responsibilities seriously and intend to only make recommendations believed appropriate for the client.

As described earlier, Phil Couture has served in various executive positions for a variety of organizations. Phillip Couture is not compensated for these activities, which account for less than ten percent of his time, typically occurring after traditional business hours.

Item 5 - Additional Compensation

Neither our advisory firm nor Phil Couture is compensated for advisory services involving performance-based fees. In addition, firm policy does not allow associated persons to accept or receive additional economic benefit, such as sales awards or other prizes, for providing advisory services to firm clients.

Item 6 - Supervision

Phil Couture serves as the firm's Chief Compliance Officer. Because supervising one's self poses a conflict of interest, the firm has adopted policies and procedures to mitigate this conflict and to ensure oversight obligations are met. Questions relative to the firm, its services, or this brochure supplement may be made to the attention of Phil Couture at (941) 366-3551. Additional information about the firm, other advisory firms, or an associated investment advisor representative is available on the internet at www.adviserinfo.sec.gov. A search of this site for firms may be accomplished by firm name or a unique firm identifier, known as an IARD or CRD number. The CRD number for our firm is 134303. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling the Florida Division of Securities at (850) 487-9687 or the state securities administrator in which the client resides.

Item 7 - Requirements for State-Registered Advisers

There have been neither awards nor other matter where our firm or Phil Couture has been found liable in an arbitration, self-regulatory or administrative proceeding. Please refer to Item 9 of Part 2A of Form ADV for any firm regulatory matters. Our advisory firm has not been the subject of a bankruptcy petition.







COUTURE FINANCIAL, INC.

Registered Investment Advisor
CRD # 134303

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Suite 881
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Fax: (941) 366-3439
Toll-Free: (800) 553-3385
www.couturefinancial.com

M Lance Couture

Vice President/Compliance Officer
Investment Advisor Representative
CRD # 2748244

Form ADV Part 2B

Brochure Supplement
August 24, 2023

This brochure provides information about M Lance Couture that supplements Couture Financial, Inc. Form ADV Part 2A firm brochure. You should have received a copy of that brochure. Please contact our firm at (941) 366-3551 if you did not receive the full brochure or if you have any questions about the contents of this supplement. Additional information about M Lance Couture is available on the Securities and Exchange Commission's (SEC) website at www.adviserinfo.sec.gov.



Item 2 - Educational Background and Business Experience

Regulatory guidance requires the firm to disclose relevant post-secondary education and professional training for each principal executive and associate of the firm, as well as their business experience for at least the most recent five years.

Principal Executive Officers and Management Persons

Vice President/Compliance Officer/Investment Advisor Representative

M Lance (Lance) Couture

Year of Birth: 1967 / CRD Number: 2748244

Educational Background and Business Experience

Education

Capella University, Bachelors Science in Finance (2012)
State College of Florida, Undergraduate Studies (1996 - 2002)
El Camino College, Undergraduate Studies (1989 - 1995)

Business Background

Couture Financial, Inc. - Vice President/Compliance Officer (05/1995 - Present)
Mercury Securities, LLC - Registered Representative (12/2014 - 09/2015)
Calton and Associates - Registered Representative (01/2009 - 12/2014)
Sigma Financial Corporation - Registered Representative (05/1995 - 12/2008)

Associations and Memberships

Saddlebag Creek Ranches Homeowners Association – Member/Board of Directors (02/2017 – 3/2018): Lance Couture served as Director of Communications for the Board in the residential community of 60 homes.

Industry Examinations

FINRA Series 7/General Securities Representative (Inactive): Administered by the Financial Industry Regulatory Authority, 250 multiple-choice questions - administered in two parts of 125 questions each; 3 hours testing time for each part. This registration qualifies a candidate for the solicitation, purchase, and/or sale of all securities products, including corporate securities, municipal securities, municipal fund securities, options, direct participation programs, investment company products, and variable contracts.

NASAA Series 63/Uniform Securities Agent State Law Examination: This is a 60 multiple-choice questions, and 1 hour and 15 minutes testing time. The Series 63 is designed to qualify candidates as securities agents. The examination covers the principles of state securities regulation reflected in the Uniform Securities Act.

NASAA Series 65/Uniform Investment Adviser Law Examination: This is 130 multiple-choice questions, and 3 hours testing time. The Series 65 is designed to qualify candidates as investment adviser representatives.

Life, Disability, & Variable Annuity Insurance License: Administered by the Florida Department of Financial Services, completion of 40 hours of approved insurance course for life, health, and variable annuity insurance along with 100 multiple-choice questions; 2 hours testing time. This insurance license is designed to qualify an individual representing an insurer as to life insurance and annuity contracts, including agents appointed to transact life insurance, fixed-dollar annuity contracts, or variable contracts by the same



insurer. Annuity contracts, including, but not limited to, fixed or variable annuity contracts; the granting of endowment benefits, additional benefits in event of death or dismemberment by accident or accidental means, additional benefits in event of the insured's disability; and optional modes of settlement of proceeds of life insurance.

NOTE: Financial Industry Regulatory Authority (FINRA), North American Securities Administrator Association (NASAA) and state insurance examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of a securities or insurance industry examination does not constitute or imply a person is "approved" or "endorsed" by a securities regulatory organization, or state securities and/or insurance commissioner.

Item 3 - Disciplinary Information

Registered investment advisors are required to disclose certain material facts about its associated personnel regarding any legal or disciplinary events, including criminal or civil action in a domestic, foreign or military court, or any proceeding before a state, federal or foreign regulatory agency, self-regulatory organization, or suspension or sanction by a professional association for violation of its conduct rules, that would be material to your evaluation of each officer or a supervised person providing investment advice. Lance Couture has not been the subject of any such event.

Item 4 - Other Business Activities

Investment advisor representatives are required to disclose outside business activities that account for a significant portion of their time or income, or that may present a conflict of interest with their advisory activities.

Lance Couture 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. He does not receive commissions, bonuses or other compensation based on the sale of securities, including that as a registered representative of a broker/dealer or the distribution or service ("trail") fees from the sale of mutual funds.

Lance Couture is a licensed insurance agent and is able to sell annuities, life, health and long-term care coverage to interested parties through various unaffiliated insurance companies where he may receive a commission or agency overrides from the issuer on a client's purchase of the insurance contract. These activities involve 10% or less of his time during and after traditional business hours each month. He may therefore perform in the role as insurance agent, investment advisor representative and will disclose in advance of a transaction or advisory agreement the capacity in which he is serving a client, to include the conflict of interest the role or service to be provided may incur. The potential for the receipt of commissions and other compensation creates an incentive to make recommendations based on the compensation rather than client need. Lance Couture and our advisory firm take their responsibilities seriously and intend to only make recommendations believed appropriate for the client.

Item 5 - Additional Compensation

Neither our advisory firm nor Lance Couture is compensated for advisory services involving performance-based fees. In addition, firm policy does not allow associated persons to accept or receive additional economic benefit, such as sales awards or other prizes, for providing advisory services to firm clients.



Item 6 - Supervision

Firm policies and procedures have been designed to ensure appropriate recordkeeping and supervision, and all associates are required to adhere to our firm's Code of Ethics and procedural guidelines. Phil Couture, as Chief Compliance Officer, will monitor firm activities and the advice provided by performing the following ongoing reviews:

- Account opening documentation when the relationship is established
- Review of account transactions
- Assessments of the client's financial situation, objectives, and investment needs
- A review of client correspondence on an as-needed basis
- Periodic internal firm review

Questions relative to the firm, its services, or this brochure supplement may be made to the attention of Phil Couture at (941) 366-3551. Additional information about the firm, other advisory firms, or an associated investment advisor representative is available on the internet at www.adviserinfo.sec.gov. A search of this site for firms may be accomplished by firm name or a unique firm identifier, known as an IARD or CRD number. The CRD number for our firm is 134303. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling the Florida Division of Securities at (850) 487-9687 or the state securities administrator in which the client resides.

Item 7 - Requirements for State-Registered Advisers

There have been neither awards nor sanctions or other matter where Lance Couture has been found liable in an arbitration, self-regulatory or administrative proceeding. Neither Lance Couture nor our advisory firm has been the subject of a bankruptcy petition.

