# Abundance Financial Coaching, LLC Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Abundance Financial Coaching, LLC. If you have any questions about the contents of this brochure, please contact us at 563-359-7400 or by email at: ryan@duffylawoffice.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Abundance Financial Coaching, LLC is also available on the SEC's website at <u>www.adviserinfo.sec.gov</u>. Abundance Financial Coaching, LLC's CRD number is: 175055.

1840 E. 54<sup>th</sup> Street Davenport, IA 52807 563-359-7400 ryan@duffylawoffice.com http://abundancefinancial.net

Registration does not imply a certain level of skill or training.

Version Date: 02/02/2023

# **Item 2: Material Changes**

The material changes in this brochure from the last annual updating amendment of Abundance Financial Coaching, LLC on 02/02/2022, are described below. Material changes relate to Abundance Financial Coaching, LLC's policies, practices or conflicts of interests.

- Abundance Financial Coaching, LLC has updated Item 4 to disclose the titles of the owners of the firm.
- Abundance Financial Coaching, LLC has updated Item 10C to disclose that Scott Schomer and Victor Veprauskas are attorneys.

# **Item 3: Table of Contents**

Item 1	1: Cover Page	
Item 2	2: Material Changes	ii
Item 3	3: Table of Contents	iii
Item 4	4: Advisory Business	5
A.	Description of the Advisory Firm	5
В.	Types of Advisory Services	5
C.	Client Tailored Services and Client Imposed Restrictions	6
D.	Wrap Fee Programs	6
E	Assets Under Management	6
Item 5	5: Fees and Compensation	7
A.	Fee Schedule	7
В. 1	Payment of Fees	7
C.	Client Responsibility For Third Party Fees	8
D.	Prepayment of Fees	8
E. 0	Outside Compensation For the Sale of Securities to Clients	8
Item 6	5: Performance-Based Fees and Side-By-Side Management	9
Item 7	7: Types of Clients	9
Item 8	3: Methods of Analysis, Investment Strategies, & Risk of Loss	9
A.	Methods of Analysis and Investment Strategies	9
В.	Material Risks Involved	10
C.	Risks of Specific Securities Utilized	10
Item 9	9: Disciplinary Information	11
A.	Criminal or Civil Actions	11
B.	Administrative Proceedings	11
C.	Self-regulatory Organization (SRO) Proceedings	12
Item 1	10: Other Financial Industry Activities and Affiliations	12
A.	Registration as a Broker/Dealer or Broker/Dealer Representative	12
B.	Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor	12
C.	Registration Relationships Material to this Advisory Business and Conflicts of Interests	12
D.	Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections	13
Item 1	11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	14
A.	Code of Ethics	14
B.	Recommendations Involving Material Financial Interests	14
C.	Investing Personal Money in the Same Securities as Clients	14
D.	Trading Securities At/ Around the Same Time as Clients' Securities	14

Item 12	Brokerage Practices	14
A.	Factors Used to Select Custodians and/or Broker/Dealers	14
В.	Aggregating (Block) Trading for Multiple Client Accounts	15
Item 13	Reviews of Accounts	15
A.	Frequency and Nature of Periodic Reviews	15
В.	Factors That Will Trigger a Non-Periodic Review of Client Accounts	15
C.	Content and Frequency of Regular Reports Provided to Clients	15
Item 14	Client Referrals and Other Compensation	16
A.	Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes) .	16
В.	Compensation to Non - Advisory Personnel for Client Referrals	16
Item 15	: Custody	16
Item 16	Investment Discretion	16
Item 17	· Voting Client Securities (Proxy Voting)	17
Item 18	Financial Information	18
A.	Balance Sheet	18
B.	Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients	18
C.	Bankruptcy Petitions in Previous Ten Years	18
Item 19	Requirements For State Registered Advisers	18
A.	Principal Executive Officers and Management Persons; Their Formal Education and Business Background	18
В.	Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)	18
C.	Calculation of Performance-Based Fees and Degree of Risk to Clients	18
D.	Material Disciplinary Disclosures for Management Persons of this Firm	19
E.	Material Relationships That Management Persons Have With Issuers of Securities (If Any)	19

### **Item 4: Advisory Business**

#### A. Description of the Advisory Firm

Abundance Financial Coaching, LLC (hereinafter "AFC") is a Limited Liability Company organized in the State of Iowa.

The firm was formed in January 2015, and the principal owners are Ryan Michael Denman, Member & Chief Compliance Officer and Dennis Daniel Duffy, Managing Member.

#### **B.** Types of Advisory Services

#### Selection of Other Advisers

AFC recommends third-party investment advisers to manage all or a portion of the client's assets. Before selecting other advisers for clients, AFC will always ensure those other advisers are properly licensed or registered as an investment adviser. AFC conducts due diligence on any third-party investment adviser, which may involve one or more of the following: phone calls, meetings and review of the third-party adviser's performance and investment strategy. AFC then makes investments with a third-party investment adviser by investing with the third-party adviser. These investments may be allocated either through the third-party adviser's fund or through a separately managed account managed by such third party adviser on behalf of AFC's client. AFC will review the ongoing performance of the third-party adviser as a portion of the client's portfolio.

#### Portfolio Analysis (PDR) Services

AFC performs a Portfolio Diagnostic Review ("PDR") to review a prospective clients current portfolio and use it to provide a comparison to a recommended portfolio.

#### Services Limited to Specific Types of Investments

AFC generally limits its investment advice to mutual funds, fixed income securities, and equities. AFC always recommends modern-portfolio theory to all of its clients.

#### Educational Workshops

AFC holds regular and consistent workshops for prospective and existing clients. The workshop topics focus on a wide variety of topics including current events, portfolio information, and financial education.

#### Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent professional advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Provide you with full disclosure of conflicts of interest and how we mitigate them.

#### C. Client Tailored Services and Client Imposed Restrictions

AFC offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client's current situation (income, tax levels, and risk tolerance levels). Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

#### D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. AFC does not participate in any wrap fee programs.

#### E. Assets Under Management

The firm does not have any regulatory assets under management but has approximately \$262,823,147 in assets under advisement as of January 2023.

# **Item 5: Fees and Compensation**

#### A. Fee Schedule

#### Selection of Other Advisers Fees

AFC will direct advisory clients to the outside money management firm, Efficient Advisors, LLC. AFC will receive its standard fee as deducted by the third-party adviser. The fee will vary each billing period depending on fluctuations in the account's market value. The fees shared are negotiable and will not exceed any limit imposed by any regulatory agency.

AFC will specifically direct clients to Efficient Advisors, LLC. The annual fee schedule is as follows:

Total Assets	AFC's Fee	Third Party's Fee	Total Fee
First \$500,000	0.88%	0.35%	1.23%
Next \$500,000	0.50%	0.35%	0.85%
Next \$1,000,000	0.40%	0.30%	0.70%
Next \$2,000,000	0.40%	0.25%	0.65%
Next \$6,000,000	0.25%	0.20%	0.45%
Over \$10,000,000	0.25%	0.15%	0.40%

The fees are calculated as of the last business day of the prior month. Clients may terminate the agreement without penalty for a full refund of AFC's fees within five business days of signing the client contract. Thereafter, clients may terminate the client contract generally upon written notice.

#### Portfolio Analysis (PDR) Services

There is no fee for the Portfolio Diagnostic Review ("PDR") performed by AFC.

#### **Educational Workshop Fees**

There is no fee to attend these workshops.

#### **B.** Payment of Fees

#### Payment of Selection of Other Advisers Fees

AFC does not deduct its advisory fees. Fees are directly withdrawn by Efficient Advisors from the client's accounts with client's written authorization. Specifically, Efficient Advisors, calculates and has the client's custodian withdraw the fees based on the

negotiated rate memorialized in the client contract; Efficient Advisors, LLC; then pays to AFC the entire advisory fee. Fees are paid monthly in advance.

AFC will ensure clients receive a statement from the custodian at least monthly, and send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Clients are urged to compare the account statements they received from custodian with the reports and invoices they receive from AFC. Clients should promptly notify AFC with any discrepancies.

Fees are prorated for clients that agree to services in the middle of the billing month and the prior partial months prorated fees will be paid the following month along with its next month's fees.

#### C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by AFC. Please see Item 12 of this brochure regarding broker-dealer/custodian.

#### **D. Prepayment of Fees**

AFC collects fees monthly, in advance. Should the client terminate the agreement with AFC mid-month, AFC will refund the portion of the unearned, prepaid fee to the client. With respect to Efficient Advisors, LLC's fee, the fees are not refunded if the client terminates contract after fees have been deducted from the client's account payable during that month. Clients can terminate the contract before fees are deducted from the client's account which is usually 7-15 days from the beginning of the month.

#### E. Outside Compensation For the Sale of Securities to Clients

Supervised persons licensed to accept compensation for the sale of insurance products to AFC clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending insurance products for which the supervised persons receives compensation, AFC will document the conflict of interest in the client file and inform the client of the conflict of interest. Clients always have the right to decide whether to purchase AFC-recommended products and, if purchasing, have the right to purchase those products through other agents that are not affiliated with AFC.

Commissions are not AFC's primary source of compensation for advisory services. Advisory fees that are charged to clients are not reduced to offset the commissions or insurance products recommended to clients.

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

AFC does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client and therefore doesn't engage in side-by-side management.

# **Item 7: Types of Clients**

AFC generally provides advisory services to the following types of clients:

- Individuals
- ❖ High-Net-Worth Individuals

There is no account minimum for any of AFC's services.

# Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

#### A. Methods of Analysis and Investment Strategies

#### Methods of Analysis

AFC's methods of analysis include modern portfolio theory. This is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset. See discussion of risks immediately below.

#### **Investment Strategies**

AFC recommends passive long-term investing via selection of other advisers. This consists most of indexed ETFs. Long-term investing generally refers to holding an investment for ten or more years. This approach to investing is designed to capture market rates of both return and risk. In utilizing other investment advisers, the firm outsources selection of specific securities for the portfolio. See discussion of risks immediately below.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

#### **B.** Material Risks Involved

#### Methods of Analysis

Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns. Risks include those of equity and fixed income more generally (described below). Additionally, there is risk that the market price is not an accurately indicator of a security's true "value" (and thus the tradeoff between risk versus return may not be as expected) and risk that even a well-diversified portfolio may have more correlation than expected under certain market conditions.

#### **Investment Strategies**

Long term investing is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Selection of Other Advisers: Although AFC will seek to select only money managers who will invest clients' assets with the highest level of integrity, AFC's selection process cannot ensure that money managers will perform as desired and AFC will have no control over the day-to-day operations of any of its selected money managers. AFC would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulator breach or fraud.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

### C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds & ETFs:** Investing in mutual funds and ETFs carry the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have internal costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

# **Item 9: Disciplinary Information**

Clients can obtain the disciplinary history, if any, of AFC and its representatives from the Massachusetts Securities Division upon request. Please also see below for a discussion of applicable disciplinary history.

#### A. Criminal or Civil Actions

There are no criminal or civil actions to report.

#### **B.** Administrative Proceedings

There are no administrative proceedings to report.

#### C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

### **Item 10: Other Financial Industry Activities and Affiliations**

#### A. Registration as a Broker/Dealer or Broker/Dealer Representative

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

# B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither AFC nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

# C. Registration Relationships Material to this Advisory Business and Conflicts of Interests

Ryan Michael Denman, Dennis Daniel Duffy, Maritess T. Bott, James Andrew Miller, Scott Schomer and Victor Veprauskas are lawyers and from time to time, they may offer clients legal services, advice or products from those activities and clients should be aware that these services are a conflict of interest. AFC always acts in the best interest of the client always have the right to decide whether to utilize the services of any representative of AFC in connection with such individual's activities outside of AFC including legal services.

Dennis Daniel Duffy and James Andrew Miller are independent licensed insurance agents, and from time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. AFC always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients always have the right to decide whether to purchase AFC recommended products and, if purchasing, have the right to purchase those products through other agents that are not affiliated with AFC.

All material conflicts of interest under California Code of Regulations Section 260.238(k) are disclosed regarding the investment adviser, its representatives or any of its employees,

which could be reasonable expected to impair the rendering of unbiased and objective advice.

#### D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

AFC directs clients to third-party investment advisers to manage all or a portion of the client's assets. AFC will be compensated via a fee share from the advisers to which it directs those clients. This relationship will be memorialized in each contract between AFC and each third-party advisor. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that AFC has an incentive to direct clients to the third-party investment advisers that provide AFC with a larger fee split. AFC will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. AFC will ensure that all recommended advisers are licensed or notice filed in the states in which AFC is recommending them to clients.

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

#### A. Code of Ethics

AFC has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. AFC's Code of Ethics is available free upon request to any client or prospective client.

#### **B.** Recommendations Involving Material Financial Interests

AFC does not recommend that clients buy or sell any security in which a related person to AFC or AFC has a material financial interest.

#### C. Investing Personal Money in the Same Securities as Clients

As part of its Code of Ethics, AFC has implemented a restricted list to ensure that neither the adviser nor its representatives will trade in securities that AFC also recommends to clients.

#### D. Trading Securities At/Around the Same Time as Clients' Securities

Please see Item 11.C above.

### **Item 12: Brokerage Practices**

#### A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on AFC's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent.

Efficient Advisors, LLC has relationships in place with Custodians. AFC assist the client in choosing a preferred Custodians utilized by Efficient Advisors, LLC.

#### 1. Research and Other Soft-Dollar Benefits

AFC does not trade client's accounts and therefore receives no research, product, or services from a broker-dealer ("soft dollar benefits").

#### 2. Brokerage for Client Referrals

AFC receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

#### 3. Clients Directing Which Broker/Dealer/Custodian to Use

AFC does not trade client's accounts. AFC assist the client in choosing a preferred Custodians utilized by Efficient Advisors, LLC

#### B. Aggregating (Block) Trading for Multiple Client Accounts

AFC does not trade clients' accounts and therefore does not have the ability to block trade purchases across accounts.

#### **Item 13: Reviews of Accounts**

#### A. Frequency and Nature of Periodic Reviews

All client accounts for AFC's advisory services provided on an ongoing basis are reviewed at least annually with the client by Ryan M Denman, Member and Chief Compliance Officer and Dennis D. Duffy, Managing Member with regard to clients' respective investment policies and risk tolerance levels. All accounts at AFC are assigned to this reviewer.

#### B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

#### C. Content and Frequency of Regular Reports Provided to Clients

Each client of AFC's advisory services provided on an ongoing basis will receive a monthly statement detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

### **Item 14: Client Referrals and Other Compensation**

# A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

AFC does not receive any economic benefit, directly or indirectly from TD Ameritrade, Charles Schwab, or any other custodian.

AFC may receive additional compensation for administrative and marketing services ("Additional Services") from Efficient Advisors which is a conflict of interest. Consequently, in order to continue to obtain the Additional Services from Efficient Advisors, AFC may have an incentive to recommend Efficient Advisors' program to its clients; however, AFC's receipt of Additional Services does not diminish its duty to act in the best interests of it clients.

#### B. Compensation to Non – Advisory Personnel for Client Referrals

AFC does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

### **Item 15: Custody**

AFC does not deduct its advisory fees. Fees are withdrawn by Efficient Advisors directly from the client's accounts with client's written authorization. Custody of client's accounts is held primarily at the client's custodian.

AFC will ensure clients receive a statement from the custodian at least monthly, and send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends invoices to the client. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Clients are urged to compare the account statements they received from custodian with the reports and invoices they receive from AFC. Clients should promptly notify AFC with any discrepancies.

### **Item 16: Investment Discretion**

AFC does not manage client accounts and therefore does not have discretion over client accounts at any time; however, Efficient Advisors does maintain discretion of client accounts.

# **Item 17: Voting Client Securities (Proxy Voting)**

AFC will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

#### **Item 18: Financial Information**

#### A. Balance Sheet

AFC neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

# B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither AFC nor its management has any financial condition that is likely to reasonably impair AFC's ability to meet contractual commitments to clients.

#### C. Bankruptcy Petitions in Previous Ten Years

AFC has not been the subject of a bankruptcy petition in the last ten years.

### **Item 19: Requirements For State Registered Advisers**

# A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

The education and business backgrounds of AFC's current management persons, Ryan Michael Denman and Dennis Daniel Duffy, can be found on the Form ADV Part 2B brochure supplements for those individuals.

# B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

#### C. Calculation of Performance-Based Fees and Degree of Risk to Clients

AFC does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

# D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.

This brochure supplement provides information about Dennis Daniel Duffy that supplements the Abundance Financial Coaching, LLC brochure. You should have received a copy of that brochure. Please contact Dennis Daniel Duffy if you did not receive Abundance Financial Coaching, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Dennis Daniel Duffy is also available on the SEC's website at www.adviserinfo.sec.gov.

# Abundance Financial Coaching, LLC

Form ADV Part 2B - Individual Disclosure Brochure

for

# **Dennis Daniel Duffy**

Personal CRD Number: 5066464 Investment Adviser Representative

> Abundance Financial Coaching, LLC 1840 E. 54th Street Davenport, IA 52807 563-359-7400 dennis@duffylawoffice.com http://abundancefinancial.net

# Item 2: Educational Background and Business Experience

Name: Dennis Daniel Duffy Born: 1955

### **Educational Background and Professional Designations:**

#### **Education:**

Juris Doctor Law, University of Iowa College of Law - 1989 Masters of Business Administration Business, University of Iowa - 1989 Bachelor of Business Administration Business, University of Iowa - 1978 Associates of Arts General, Palmer Junior College - 1976

#### **Business Background:**

01/2015 - Present Managing Member/

Investment Adviser Representative Abundance Financial Coaching, LLC

01/2018 - Present Attorney/Partner

Duffy Law Office, PLLC

04/1995 - 12/2017 Attorney/Owner

Duffy Law Office

11/2005 – 02/2015 Owner/Financial Coach

Wisdom Financial Services, L.L.C.

# **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

#### **Item 4: Other Business Activities**

Dennis Daniel Duffy is a lawyer. From time to time, he will offer clients advice or products from this activity and clients should be aware that these services are a conflict of interest. Abundance

Financial Coaching, LLC always acts in the best interest of the client always have the right to decide whether to utilize the services of any representative of Abundance Financial Coaching, LLC in connection with such individual's activities outside of Abundance Financial Coaching, LLC including legal services.

Dennis Daniel Duffy is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities and clients should be aware that these services are a conflict of interest. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Abundance Financial Coaching, LLC always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients always have the right to decide whether to purchase Abundance Financial Coaching, LLC recommended products and, if purchasing, have the right to purchase those products through other agents that are not affiliated with Abundance Financial Coaching, LLC.

Dennis Daniel Duffy spends 40 hours per week of his time on legal activities and considers them his primary business.

# **Item 5: Additional Compensation**

Dennis Daniel Duffy does not receive any economic benefit from any person, company, or organization, other than Abundance Financial Coaching, LLC in exchange for providing clients advisory services through Abundance Financial Coaching, LLC.

# **Item 6: Supervision**

Dennis Daniel Duffy is a co-owner and co-supervisor of Abundance Financial Coaching, LLC, and works closely with co-supervisor Ryan M. Denman. All advice provided to clients is reviewed by this co-supervisor prior to implementation. Ryan Denman can be reached at (563) 359-7400. Dennis Daniel Duffy adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

# Item 7: Requirements For State Registered Advisers

This disclosure is required by Iowa and Illinois state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

- A. Dennis Daniel Duffy has NOT been involved in any of the events listed below.
  - 1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  - 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. Dennis Daniel Duffy has NOT been the subject of a bankruptcy petition in the past ten years.

This brochure supplement provides information about Ryan Michael Denman that supplements the Abundance Financial Coaching, LLC brochure. You should have received a copy of that brochure. Please contact Ryan Michael Denman if you did not receive Abundance Financial Coaching, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Ryan Michael Denman is also available on the SEC's website at www.adviserinfo.sec.gov.

# Abundance Financial Coaching, LLC

Form ADV Part 2B - Individual Disclosure Brochure

for

# Ryan Michael Denman

Personal CRD Number: 6180720 Investment Adviser Representative

> Abundance Financial Coaching, LLC 1840 E. 54th Street Davenport, IA 52807 563-359-7400 ryan@duffylawoffice.com http://abundancefinancial.net/

> > UPDATED: 06/04/2020

# Item 2: Educational Background and Business Experience

Name: Ryan Michael Denman Born: 1985

**Educational Background and Professional Designations:** 

#### **Education:**

Juris Doctorate Law, University of Iowa - 2011 Bachelors of Art Economics, University of Iowa - 2007

#### **Business Background:**

01/2015 - Present Member/Investment Adviser Representative

Abundance Financial Coaching, LLC

01/18 - Present Attorney/Partner

Duffy Law Office, PLLC

08/2011 – 12/17 Associate Attorney

**Duffy Law Office** 

01/2014 - 02/2015 Financial Coach

Wisdom Financial Services, LLC

08/2004 - 06/2011 Student

University of Iowa

# **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

#### **Item 4: Other Business Activities**

Ryan Michael Denman is a lawyer. From time to time, he will offer clients advice or products from this activity and clients should be aware that these services are a conflict of interest. Abundance Financial Coaching, LLC always acts in the best interest of the client. Clients are in

no way required to utilize the services of any representative of Abundance Financial Coaching, LLC in their capacity as a lawyer.

Ryan Michael Denman spends 50 hours per week of his time on those activities and considers them his primary business.

### **Item 5: Additional Compensation**

Ryan Michael Denman does not receive any economic benefit from any person, company, or organization, other than Abundance Financial Coaching, LLC in exchange for providing clients advisory services through Abundance Financial Coaching, LLC.

### **Item 6: Supervision**

Ryan Michael Denman is a co-owner and co-supervisor of Abundance Financial Coaching, LLC, and works closely with co-supervisor Dennis D Duffy. All advice provided to clients is reviewed by this co-supervisor prior to implementation. Dennis Duffy can be reached at (563) 359-7400. Ryan Michael Denman adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

# Item 7: Requirements For State Registered Advisers

This disclosure is required by Iowa and Illinois state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

- A. Ryan Michael Denman has NOT been involved in any of the events listed below.
  - 1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  - 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. Ryan Michael Denman has NOT been the subject of a bankruptcy petition in the past ten years.

This brochure supplement provides information about James Andrew Miller that supplements the Abundance Financial Coaching, LLC brochure. You should have received a copy of that brochure. Please contact James Andrew Miller if you did not receive Abundance Financial Coaching, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about James Andrew Miller is also available on the SEC's website at www.adviserinfo.sec.gov.

# Abundance Financial Coaching, LLC

Form ADV Part 2B - Individual Disclosure Brochure

for

# **James Andrew Miller**

Personal CRD Number: 5081879 Investment Adviser Representative

> Abundance Financial Coaching, LLC 108 Grove Street, Suite 2 Worcester, MA 01605 (508) 799-8885 jmiller@massachusettsmedicaid.com

> > UPDATED: 06/11/2020

# Item 2: Educational Background and Business Experience

Name: James Andrew Miller Born: 1959

**Educational Background and Professional Designations:** 

#### **Education:**

Juris Doctor law, Suffolk University - 1993

#### **Business Background:**

08/2016 - Present Investment Adviser Representative

Abundance Financial Coaching, LLC

05/2014 - 07/2016 Owner & Investment Adviser Representative

Wisdom Financial, LLC

10/1994 - Present Lawyer

The Law Offices of James A. Miller, P.C.

# **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

### **Item 4: Other Business Activities**

James Andrew Miller is a lawyer. From time to time, he will offer clients advice or products from this activity and clients should be aware that these services are a conflict of interest. Abundance Financial Coaching, LLC always acts in the best interest of the client. Clients are in no way required to utilize the services of any representative of Abundance Financial Coaching, LLC in their capacity as a lawyer.

James Andrew Miller is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity and clients should be aware that these services are a conflict of interest. Clients should be aware that these services pay a commission which is a conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Abundance Financial Coaching, LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Abundance Financial Coaching, LLC in their capacity as a licensed insurance agent.

### **Item 5: Additional Compensation**

James Andrew Miller does not receive any economic benefit from any person, company, or organization, other than Abundance Financial Coaching, LLC in exchange for providing clients advisory services through Abundance Financial Coaching, LLC.

### **Item 6: Supervision**

As a representative of Abundance Financial Coaching, LLC, James Andrew Miller is supervised by Ryan M Deman, the firm's Chief Compliance officer. Ryan M Deman is responsible for ensuring that James Andrew Miller adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Ryan Deman is (563) 359-7400.

# Item 7: Requirements For State Registered Advisers

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

- A. James Andrew Miller has NOT been involved in any of the events listed below.
  - 1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  - 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. James Andrew Miller has NOT been the subject of a bankruptcy petition in the past ten years.



#### Table of Fees for Services

Carefully read Item 4, 5, and 6 Form ADV Part 2A ("Brochure"), as these sections of the Brochure contain important details about Abundance Financial Coaching advisory services and fees. Fees are not negotiable and will only apply to you when you request the services listed.

Fees Charged by	Fee Schedule	Fee	Frequency	Services
Investment Adviser	Market Value	Percentage	Fee is Charged	
Assets Under Advisement Fee	First \$500,000 Next \$500,000 Next \$1,000,000 Next \$2,000,000 Next \$6,000,000 Over \$10,000,000	0.88% 0.50% 0.40% 0.40% 0.25% 0.25%	Annual Fee - Billed Monthly	Portfolio management for individual and/or small businesses; selection of other advisers; educational seminars
Hourly Fee	N/A	N/A	N/A	
Subscription Fee	N/A	N/A	N/A	
Fixed Fee	N/A	N/A	N/A	
Commissions to the Advisor	N/A	N/A	N/A	
Performance-based Fee	N/A	N/A	N/A	
Any Other Fee	N/A	N/A	N/A	
Fees Charged by Third Parties	Fee Schedule Market Value	Fee Percentage	Frequency Fee is Charged	Services
Efficient Advisors Assets Under Management Fee	First \$500,000 Next \$500,000 Next \$1,000,000 Next \$2,000,000 Next \$6,000,000 Over \$10,000,000	0.35% 0.35% 0.30% 0.25% 0.20% 0.15%	Annual Fee - Billed Monthly	Portfolio management
Custodial Fees (TD Ameritrade & Charles Schwab)  Custodial Fees are either based on individual trades at TD Ameritrade or Charles Schwab or based on the size of an account. Accounts generally under \$20,000 are based on trades.	N/A	N/A	N/A	Custodial

Please talk with your adviser about fees and costs applicable to you. Effective January 1, 2022.

# ABUNDANCE FINANCIAL COACHING, LLC

1840 E. 54TH STREET, DAVENPORT, IA 52807 563-359-7400 - RYAN@DUFFYLAWOFFICE.COM

#### PRIVACY NOTICE - OPT-IN

Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives customers the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

# TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect NPI about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information and Financial Account Numbers and/or Balances, Sources of Income, Credit Card Numbers or other Information. When you are no longer our customer, we may continue to share your information only as described in this notice.

# PARTIES TO WHOM WE DISCLOSE INFORMATION

All Investment Advisers may need to share NPI to run their everyday business. In the section below, we list the typical reasons that we may share your personal information:

- For everyday business purposes such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations, or report to credit bureaus;
- > For our marketing to offer our products and services to you;
- > For joint marketing with other financial companies;
- > For our affiliates' everyday business purposes information about your transactions and experiences and information about your creditworthiness; or
- > For affiliates and non-affiliates to market to you.

If you are a new customer we may begin sharing your information on the day you sign our agreement. When you are no longer our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

# PROTECTING CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

# FEDERAL & STATE LAW ALLOWS YOU TO LIMIT SHARING - OPTING OUT AND OPTING IN

Federal law allows you the right to limit the sharing of your NPI by "opting-out" of the following: sharing for affiliates' everyday business purposes; sharing information about your creditworthiness; or sharing with affiliates or non-affiliates who use your information to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately at our address or telephone number if you choose to opt out of these types of sharing.

State law gives you additional rights to limit sharing. Under certain states' laws, we may not share NPI about you with non-affiliates unless you first give us written permission ("opting-in"). If you do not give us permission to share your information, then we are prohibited from sharing this information with non-affiliates as defined below.

I give you perm	ission to share	my NPI with	ı non-affiliates.

DEFINITIONS: <u>Affiliates</u> – companies related by common ownership or control. They can be financial and nonfinancial companies; <u>Nonaffiliates</u> – companies not related by common ownership or control. They can be financial and nonfinancial companies; <u>Joint marketing</u> – a formal agreement between non-affiliated financial companies that together market financial products or services to you.

Signature of Client(s): \_\_\_\_\_

Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.