

Item 1 – Cover Page

Part 2A of Form ADV

Atwood Financial Planning LLC

Lori Atwood, CFP®
2911 33rd PI NW
Washington, DC 20008
By Appointment Only
Ph: 202 415 0803
Email: Lori@atwoodfinancial.com
Website: www.atwoodfinancial.com
CRD: 288941

September, 2025

This Brochure provides information about the qualifications and business practices of Atwood Financial Planning, LLC. If you have any questions about the contents of this Brochure, please contact us using the information listed above. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Atwood Financial Planning, LLC (CRD# 288941) is a registered investment advisor with the SEC. Registration of an investment advisor does not imply any certain level of skill or training.

Additional information about Atwood Financial Planning, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

Since this last Annual Updating Amendment filed in January 2025, the Firm has added new service lines and updated this brochure.

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	6
Item 6 - Performance-Based Fees and Side-By-Side Management	8
Item 7 – Types of Clients & Account Minimums	8
Item 8 – Methods of Analysis, Investment Strategies, Investment Tools, and Risk of Loss	8
Item 9 – Disciplinary Information	12
Item 10 – Other Financial Industry Activities and Affiliations	12
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	15
Item 15 – Custody	15
Item 16 – Investment Discretion	15
Item 17 – Voting Client Securities	15
Item 18 – Financial Information	15
Supervised Person Brochures	16

Item 4 – Advisory Business

A. Description of the Advisory Firm

Atwood Financial Planning, LLC (“Atwood” “AFP”) was formed on June 30, 2017 and is based in Washington, DC. Atwood’s principal owner is Lori Atwood.

B. Types of Advisory Services

1. FINANCIAL PLANNING AND CONSULTING

Services include an evaluation of a Client’s current and future financial state using currently known variables to predict future cash flows, savings, asset values, recommend purchase and sales, and withdrawal plans. Atwood will use current cash flow, net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans. Topics for planning may include, but are not limited:

- Personal net worth statement: A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- Cash flow analysis: An income and spending plan determines how much can be set aside for debt repayment, savings and investing each month.
- Retirement strategy: A strategy for achieving retirement independent of other financial priorities. Including a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- Long-term investment plan: Build a customized asset allocation strategy based on specific investment objectives and a risk profile. This strategy sets guidelines for selecting, buying and selling investments and establishing benchmarks for performance review.
- Tax reduction strategy: Identify ways to minimize taxes on personal income to the extent permissible by the tax code. The strategy should include identification of tax favored investment vehicles that can reduce taxation of investment income.
- Estate preservation: Help update accounts, review beneficiaries for retirement accounts and life insurance, and prompt you to update your plan when the legal environment changes or you have major life events such as a marriage, death, or births.
- Account Organization strategy: Provide recommendations on optimal account structure and types of accounts required as well as discuss transferring current accounts for efficiency and fee savings.
- Uses of Cash analysis: Recommend how much of a client’s excess cash should be held in cash for near term goals and how much can be invested as well as analyze timing as to when there will be additional excess cash to achieve goals.

If a conflict of interest exists between the interests of Atwood and the interests of the Client, the Client is under no obligation to act upon Atwood’s recommendation.

2. NON-DISCRETIONARY ASSET MANAGEMENT (“Premium Service”)

Atwood offers asset management services to advisory Clients. Atwood will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

When the Client elects to use Atwood on a non-discretionary basis, Atwood will determine the securities to be bought or sold and the amount of the securities to be bought or sold. However, Atwood will obtain prior Client approval on each and every transaction before executing any transaction.

Personalized, non-discretionary support for planning, trading, transferring accounts and other retirement-related services, provided as needed.

3. CONCIERGE SERVICES

Atwood provides one-on-one support including, but not limited to, proactive reminders, priority scheduling access, and enhanced communications regarding current economic trends, etc. This service has a six-month term. Clients may cancel at any time with 30 days' notice after the initial 6 month period. While payments are non-refundable, no further charges will be incurred after the notice period.

4. ACCOUNTABILITY SERVICES

Atwood provides bi-monthly checks of client's financial situation and financial task completion, including, but not limited to cash flow, savings and debt and provides email notification for task reminders. This service has a 6 month minimum term with no refunds applicable within that initial period. Thereafter, clients are billed quarterly and can cancel any time with no refund for that quarter, but no further charges will be incurred.

5. CORPORATE BUNDLES

Atwood works with businesses to provide packages of one-on-one financial planning sessions for their employees. Bundles are paid upfront and there is no refund, but there is no expiration date for use of the hours included in the bundle.

6. SEMINARS

Atwood holds seminars to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given.

7. SMALL GROUP WORKSHOPS

Atwood offers small group workshops. These workshops are conducted online and focus on personal finance.

8. SMALL BUSINESS PLANNING

Atwood offers small business financial planning focusing on profitability, pricing, account organization and set-up and business model optimization.

9. APP SUBSCRIPTIONS

Fearless Finance's basic platform is free to our clients, and clients will be able to connect up to 3 accounts for free. Subscribers outside of our client-base are charged \$1.99/account linked to subscribe. Clients who want to connect more than three accounts will be charged \$1.99/month per additional account.

C. Client-Tailored Services and Client-Imposed Restrictions

The Client's financial needs, investment goals, tolerance for risk, and investment objectives are documented in Atwood's Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. These restrictions can, however, prohibit engagement with Atwood.

D. Wrap Fee Programs

Atwood does not participate in a Wrap Program.

E. Amounts Under Management

As of December 31, 2024, Atwood provides management services for:

Discretionary Assets:	Non-Discretionary Assets:
\$0	\$0

Item 5 – Fees and Compensation

A. Fee Schedule

1. FINANCIAL PLANNING AND CONSULTING

Atwood charges an hourly, ongoing, and/or fixed fee for financial planning and consulting. Prior to the planning process the Client will be provided an estimated plan fee which will be based on the complexity of the engagement. Cancellations or rescheduling must be made at least two (2) business days prior to the scheduled meeting. Changes made with less notice will incur a fee equivalent to half an hour at the standard hourly rate. Atwood will charge by the quarter hour where applicable.

HOURLY FEES

Hourly Fee Services differ based upon whether the client is a new or existing client and which IAR of Atwood provides the services. A summary for hourly rates is below:

Lori Atwood New Client: \$330/hour

Lori Atwood Existing Client: \$310/hour

All Other IARs New Client: \$280/hour

All Other IARs Existing Client: \$240/hour

2. NON-DISCRETIONARY ASSET MANAGEMENT ("Premium Service")

Atwood offers its Premium Service to clients and charges \$3,600.00 annually, billed quarterly in arrears. Atwood charges this annual fee irrespective of the total assets under management. Clients can cancel after the first year and will not be charged after the quarter in which they cancel.

3. CONCIERGE SERVICES

Atwood charges \$360/year, billed monthly in arrears for its Concierge Services. Clients must commit to an initial 6 month engagement, but can cancel after the initial 6-month engagement and no additional fees will be incurred after the month in which cancellation was requested.

4. ACCOUNTABILITY SERVICES

Atwood charges \$325/6-month period, billed quarterly in arrears for its Accountability Services. Clients must commit to an initial 6 month engagement, but can cancel after the initial 6-month engagement and no additional fees will be incurred after the month in which cancellation was requested.

5. CORPORATE BUNDLES

Atwood charges \$3600 for a ten-hour bundle for its Corporate Bundles. No refunds are given once the bundle has been purchased. Once the initial ten-hour bundle is used up, employers can stop or buy another bundle. Bundles of hours never expire.

6. SEMINARS

Atwood charges \$1500 for its virtual or live seminars. The seminars are educational in nature and no specific investment or tax advice is given. Seminars are paid upfront and no refunds are provided unless Atwood cannot complete the seminar purchased.

7. SMALL GROUP WORKSHOPS

Atwood charges employers \$5000 for its Small Group Planning, which consists of five webinar-style classes over several months for 5-10 employees. Employers are responsible for recruiting participants for the Small Group Workshop. No refunds are provided, but employers can extend registration periods to recruit more participants.

8. SMALL BUSINESS PLANNING

Atwood charges \$380/hour for its small business planning and requires 2 business days' notice for cancellation. If cancellation occurs within 2 business days, the client is charged 0.5 hours as a cancellation fee.

9. APP SUBSCRIPTIONS

Fearless Finance's basic platform is free to our clients, and clients will be able to connect up to 3 accounts for free. Subscribers outside of our client-base are charged \$1.99/account linked to subscribe. Clients who want to connect more than three accounts will be charged \$1.99/month per additional account.

B. Payment of Fees

All fees are generally invoiced directly to the Client.

Atwood, in its sole discretion, may charge a lesser investment advisory fee based upon certain criteria.

For all services, Clients may terminate their engagement with Atwood within five (5) business days of signing an Agreement with no obligation and without penalty. After the initial five (5) business days, the Agreement may be terminated by Atwood with thirty (30) days written notice to Client and by the Client at any time with written notice to Atwood. However, if client terminates Premium Service within the first year, Atwood is entitled to payment of the investment advisory

fee for the initial year, due to the extent of upfront work required for the Premium Service. As a result, the Client will pay for services that are not provided if they end the engagement early and should carefully evaluate whether committing to a non-refundable first year's fee is appropriate in light of their financial situation, investment objectives, and willingness to maintain the advisory relationship for at least one year. Not all investment advisers offer services without requiring a non-refundable first year's fee.

In the case of hourly engagements, fees will be prorated based on the work completed at the stated hourly rate.

C. Additional Fees

Custodians can charge brokerage commissions, transaction fees, and other related costs on the purchases or sales of mutual funds, equities, bonds, options, margin interest, and exchange-traded funds. Mutual funds, money market funds, and exchange-traded funds may also charge internal management fees, which are disclosed in the fund's prospectus. Atwood does not directly receive any compensation from these fees. For more details on the brokerage practices, see Item 12 of this brochure.

D. Prepayment of Fees

Atwood does not expect clients to prepay fees.

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

Fees are not based on a share of the capital gains or capital appreciation of managed securities. Atwood does not use a performance-based fee structure nor "side-by-side" management because of the conflict of interest. Performance based compensation creates an incentive for Atwood to recommend an investment that may carry a higher degree of risk to the Client.

Item 7 – Types of Clients & Account Minimums

Atwood's Clients are generally individuals, small businesses, trusts, estates, high net-worth individuals, and charities. Client relationships vary in scope and length of service.

There is no minimum account size and Clients are not required to have a certain amount of investment experience or sophistication.

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

A. Methods of Analysis and Investment Strategies

When asked for investment advice, Atwood recommends only securities in the form of index funds and/or ETFs that are based on index funds, government issued securities or cash equivalent securities. Atwood Financial Planning LLC will also advise on existing assets already held by the client. Atwood Financial Planning LLC does not assess a client's specific tolerance for risk with a questionnaire when making recommendations for investments, instead

recommendations are based on discussions with the client. Specific recommendations for asset allocation between equities and fixed income (including cash equivalents) depend on the client's time horizon for use of the funds, client goals, and the client's specific requirements/risk tolerance, which are assessed by discussion with the client.

Although index funds are diversified, there is still investment risk. The investment strategy Atwood follows for all clients aims to reduce risk by recommending minimal, if any trading, and investment in low-cost index fund securities. However, all investments and securities carry risk, and Atwood acknowledges those risks here.

A client should be prepared to bear the risk of possible loss. It is possible a client's account will experience a loss due to a stock market decline. It is important that clients understand this overall risk and invest to the extent the client can bear the risk. Clients should also be appropriately diversified, and we will assist the client in doing so.

In developing a financial plan for a Client, Atwood's analysis may include cash flow analysis, debt and savings analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the SEC.

B. Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations.

C. Risks of Investments and Strategies Utilized

Investing in securities involves risk of loss that Clients should be prepared to bear. Atwood's investment approach constantly keeps the risk of loss in mind. Investors may face the following investment risks:

General Investment and Trading Risks. Clients may invest in securities and other financial instruments using strategies and investment techniques with significant risk characteristics.

Interest-rate Risk. Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

Inflation Risk. When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.

Currency Risk. Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Reinvestment Risk. This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

Liquidity Risk. Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

Management Risk. The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.

Cybersecurity Risk. Atwood and its service providers may be subject to operational and information security risks resulting from cyberattacks. Cyberattacks include, among other behaviors, stealing or corrupting data maintained online or digitally, denial of service attacks on websites, the unauthorized release of confidential information or various other forms of cybersecurity breaches. Cybersecurity attacks affecting Atwood and its service providers may adversely impact Clients. For instance, cyberattacks may interfere with the processing of transactions, cause the release of private information about Clients, impede trading, subject Atwood to regulatory fines or financial losses, and cause reputational damage. Similar types of cybersecurity risks are also present for issuers of securities in which Clients may invest in, qualified custodians, governmental and other regulatory authorities, exchange and other financial market operators, or other financial institutions. Cybersecurity incidents that could ultimately cause them to incur losses, including for example: financial losses, cost and reputational damages, and loss from damage or interruption of systems. Although Atwood has established its systems to reduce the risk of these incidents from coming to fruition, there is no guarantee that these efforts will always be successful, especially considering that Atwood does not directly control the cybersecurity measures and policies employed by third party service providers.

Exchange-Traded Funds. ETFs are a type of index fund bought and sold on a securities exchange. The risks of owning an ETF generally reflect the risks of owning the underlying securities they are designed to track, although lack of liquidity in an ETF could result in it being more volatile and ETFs have management fees that increase their costs. ETFs are also subject to other risks, including: (i) the risk that their prices may not correlate perfectly with changes in the underlying reference units; and (ii) the risk of possible trading halts due to market conditions or other reasons that, in the view of the exchange upon which an ETF trades, would make trading in the ETF inadvisable.

Mutual Fund Risks. An investment in mutual funds could lose money over short or even long periods. A mutual fund's share price and total return are expected to fluctuate within a wide range, like the fluctuations of the overall stock market.

Common Stocks and Equity-Related Securities. Certain ETFs or mutual funds hold common stock. Prices of common stock react to the economic condition of the company that issued the security, industry and market conditions, and other factors which may fluctuate widely. Investments related to the value of stocks may rise and fall based on an issuer's actual and anticipated earnings, changes in management, the potential for takeovers and acquisitions, and other economic factors. Similarly, the value of other equity-related securities, including preferred stock, warrants, and options may also vary widely.

Small- and Mid-Cap Risks. Certain ETFs and mutual funds hold securities of small- and mid-cap issuers. Securities of small-cap issuers may present greater risks than those of large-cap issuers. For example, some small- and mid-cap issuers often have limited product lines, markets, or

financial resources. They may be subject to high volatility in revenues, expenses, and earnings. Their securities may be thinly traded, may be followed by fewer investment research analysts, and may be subject to wider price swings and thus may create a greater chance of loss than when investing in securities of larger-cap issuers. The market prices of securities of small- and mid-cap issuers generally are more sensitive to changes in earnings expectations, to corporate developments, and to market rumors than are the market prices of large-cap issuers.

Highly Volatile Markets. The prices of financial instruments can be highly volatile. Price movements of forward and other derivative contracts are influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. Clients are also subject to the risk of failure of any of the exchanges on which their positions trade or of its clearinghouses.

Non-U.S. Securities. Certain ETFs and mutual funds hold securities of non-U.S. issuers. Investments in securities of non-U.S. issuers pose a range of potential risks which could include expropriation, confiscatory taxation, imposition of withholding or other taxes on dividends, interest, capital gains or other income, political or social instability, illiquidity, price volatility, and market manipulation. In addition, less information may be available regarding securities of non-U.S. issuers, and non-U.S. issuers may not be subject to accounting, auditing and financial reporting standards, and requirements comparable to or as uniform as those of U.S. issuers.

Emerging Markets. Certain ETFs and mutual funds hold securities of emerging markets issuers. In addition to the risks associated with investments outside of the United States, investments in emerging markets (i.e., the developing countries) may involve additional risks. Emerging markets generally are not as efficient as those in developed countries. In some cases, a market for the security may not exist locally, and transactions will need to be made on a neighboring exchange. Volume and liquidity levels in emerging markets are lower than in developed countries. When seeking to sell emerging market securities, little or no market may exist for the securities. In addition, issuers based in emerging markets are not generally subject to uniform accounting and financial reporting standards, practices, and requirements comparable to those applicable to issuers based in developed countries, thereby potentially increasing the risk of fraud or other deceptive practices.

Capitalization Risks. Investing in Companies within the same market capitalization category carries the risk that the category may be out of favor due to current market conditions or investor sentiment.

Market Risks. Turbulence in the financial markets and reduced liquidity may negatively affect the Companies, which could have an adverse effect on each of them. If the securities of the Companies experience poor liquidity, investors may be unable to transact at advantageous times or prices, which may decrease the Company's returns. In addition, there is a risk that policy changes by central governments and governmental agencies, including the Federal Reserve or the European Central Bank, which could include increasing interest rates, could cause increased volatility in financial markets, which could have a negative impact on the Companies. Furthermore, local, regional, or global events such as war, acts of terrorism, the spread of infectious illness or other public health issues, recessions, or other events could have a significant impact on the Companies. For example, the rapid and global spread of COVID-19, resulted in

extreme volatility in the financial markets and severe losses; reduced liquidity of many Companies' securities; restrictions on international and, in some cases, local travel; significant disruptions to business operations (including business closures); strained healthcare systems; disruptions to supply chains, consumer demand and employee availability; and widespread uncertainty regarding the duration and long-term effects of this pandemic. Some sectors of the economy and individual issuers experienced particularly large losses. In addition, the COVID-19 pandemic resulted in increased volatility and/or decreased liquidity in the securities markets. The Companies' values could decline over short periods due to short-term market movements and over longer periods during market downturns.

The foregoing list of risk factors does not purport to be a complete enumeration or explanation of the risks involved in an investment with Atwood.

Item 9 – Disciplinary Information

Atwood and its management have not been involved in any criminal or civil actions, administrative or self-regulatory enforcement proceedings, nor any legal or disciplinary events that are material to a Client's or prospective Client's evaluation of Atwood or the integrity of its management.

Item 10 – Other Financial Industry Activities and Affiliations

A. Registration as a Broker-Dealer or Broker-Dealer Representative

Neither Atwood nor its management persons are registered as a broker-dealer or broker-dealer representative.

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

Neither Atwood nor its management persons are registered as futures commission merchant, commodity pool operator, or a commodity trading advisor.

C. Relationships Material to this Advisory Business and Possible Conflicts of Interest

Neither Atwood nor its management persons have any additional material relationships to this advisory business that would present a possible conflict of interest other than what may be disclosed above.

D. Selection of Other Advisors or Managers

Atwood does not utilize nor select other advisors.

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

A. Code of Ethics

The supervised persons (supervised persons include employees and/or independent contractors) of Atwood have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Atwood supervised and addresses conflicts that may arise. The Code defines acceptable behavior for supervised persons of Atwood. The Code reflects Atwood and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when supervised persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any supervised persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Atwood's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other supervised person, officer or director of Atwood may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Atwood's Code is based on the guiding principle that the interests of the Client are our top priority. Atwood's officers, directors, advisors, and other supervised persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either supervised persons or Atwood.

Certain parts of this Code apply to "access" persons. "Access" persons are supervised persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

Atwood will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

B. Recommendations Involving Material Financial Interests

Neither Atwood nor its related persons recommend to Clients, or buys or sells for Client accounts, securities in which Atwood or a related person has a material financial interest.

C. Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Atwood and its supervised persons may invest in the same securities (or related securities, e.g., warrants, options or futures) that Atwood or a supervised person recommends to Clients. In order to mitigate conflicts of interest, such as frontrunning, Atwood's Chief Compliance Officer, or their designee, will no less than quarterly, review firm and/or personal holdings of its supervised persons. These reviews ensure that the personal trading of supervised persons does not disadvantage Clients of Atwood.

D. Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

Atwood and its supervised persons can recommend securities, or buy or sell securities for Clients accounts, at or about the same time, that they also buy or sell the same securities in their own account(s). Atwood, for instance, will place trades in an account in an attempt to earn better than money market rates. In order to mitigate conflicts of interest, such as frontrunning, Atwood's Chief Compliance Officer, or their designee, will no less than quarterly, review firm and/or personal holdings of its supervised persons. These reviews ensure that the personal trading of supervised persons does not disadvantage Clients of Atwood.

Item 12 – Brokerage Practices

A. Factors Used to Select or Recommending Broker-Dealers

When/if Atwood recommends brokerage houses for clients, it does so with a view toward recommending brokerages with the lowest fees available and responsive customer service. No other criteria is used by Atwood to determine recommendations for brokerage houses, therefore generally, discount broker/dealers are recommended, such as, but not limited to, Vanguard, Charles Schwab or Fidelity. In a case where a client already has a preferred broker/dealer or custodian, Atwood will recommend index funds, ETFs, government issued securities or cash/cash equivalents offered by the broker/dealer or custodian of the client's choice.

1. Research and Other Soft Dollar Benefits

Atwood does not receive soft dollar benefits.

2. Brokerage for Client Referrals

Atwood does not receive Client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

3. Directed Brokerage

Atwood does not generally allow Client directed brokerage.

B. Aggregating Trading for Multiple Client Accounts

Atwood only offers non-discretionary trading authorization where Client accounts are traded on an individual basis, therefore, trade aggregation does not apply.

Item 13 – Review of Accounts

If Atwood has been asked to make investment recommendations for a client, the recommendations will be reviewed annually with the client at his/her annual “check-in” appointment to review all aspects of the financial plan. For Premium clients, Atwood will review investment recommendations semi-annually and provide ongoing asset rebalancing and diversification recommendations, as needed.

Atwood recommends a long-term investment strategy based on a client’s years until retirement and client risk appetite based on discussion. We discuss risk appetite, goals and time horizon at every annual check-in. Because the recommendations we provide are long-term and do not require frequent changes, the client would likely not have cause to adjust investment recommendations during a year except based on a change in time horizon or a risk appetite change. Therefore, Atwood would only recommend adjustments, if necessary, on an annual basis unless the client is a Premium client, in which case semi-annual adjustment recommendations will be made, as needed.

Atwood does not provide reports to clients on a regular basis. The client receives a summary email after each meeting summarizing recommendations and items discussed in that meeting. There is no review conducted on a regular basis of client financial plans other than at an annual “check-in” meeting. The client is contacted for an annual check-in each year. If a client declines these meetings for three consecutive years, we assume the relationship has terminated, although clients are always welcome to return. The client may also ask to meet more frequently than annually, if desired. Most check-in meetings are annual, but some clients request semi-annual or quarterly check-in meetings. Premium Clients will be offered semi-annual check-ins as part of Premium Service. Check-in meetings are conducted by the client’s advisor at Atwood Financial.

Item 14 – Client Referrals and Other Compensation

A. Economic Benefits from Others

Atwood does not receive any economic benefits from external sources.

B. Compensation to Non-Advisory Personnel for Client Referrals

Atwood does not compensate for Client referrals.

Item 15 – Custody

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at least quarterly.

Atwood does not have custody of any client funds or securities.

Atwood is not affiliated with the custodian. The custodian does not supervise Atwood, its employees or activities.

Item 16 – Investment Discretion

Atwood only manages accounts on a non-discretionary basis.

Item 17 – Voting Client Securities

Clients will receive proxy voting information directly from the issuer and/or custodian of the security. Clients will not receive any such proxy voting material from Atwood. When assistance on voting proxies is requested by the Client, Atwood may provide recommendations to the Client. However, Atwood will not have authority to vote proxies on behalf of the Client.

Item 18 – Financial Information

A. Balance Sheet

Atwood does not require nor solicit prepayment of more than \$1,200 in fees per Client, six months or more in advance.

B. Financial Condition

At this time, neither Atwood nor its management persons have any financial conditions that are likely to reasonably impair its ability to meet contractual commitments to Clients.

C. Bankruptcy Petitions in Previous Years

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