

FORM ADV PART 2A (FIRM BROCHURE)

Financial Planning Counselors, Inc. DBA SmartPlan Investing

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Jupiter, FL 33458

(561) 744-9516

www.smartplaninvesting.com

July 28, 2020

This brochure provides information about the qualifications and business practices of SmartPlan Investing. If you have any questions about the contents of this brochure, please contact us at (561) 744-9516 or roy@smartplaninvesting.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 SmartPlan Investing is available on the SEC's website at www.adviserinfo.sec.gov.

SmartPlan Investing is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Material Changes

Form ADV Part 2 (“Firm Brochure” or “Disclosure Brochure”) requires registered investment advisers to amend their brochure when information becomes materially inaccurate and to review the Firm Brochure at least annually. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our last Annual Updating Amendment, dated June 15, 2020, we have made no material changes to our Form ADV Part 2 Disclosure Brochure.

Interim Update

This Form ADV Part 2 dated July 28, 2020 replaces the previous Form ADV Part 2 Disclosure Brochure dated June 15, 2020.

- Our firm has received a Small Business Loan through the Payroll Protection Program established under the Coronavirus Aid, Relief and Economic Security Act (“CARES ACT”). The loan does not materially impact our advisory relationships with clients, nor does it impair our ability to meet contractual obligations and fiduciary commitments to clients. The loan was taken in part to pay the salary of operations staff and individuals who is primarily responsible for performing advisory functions for our clients. The loan is forgivable provided our firm satisfies the terms of the loan program. (See Page 15)
- There were no other changes or material changes since the last annual brochure.

Full Brochure Availability

If you have any questions or would like a complete copy of our Disclosure Brochure, please contact Roy Wiley, President, at (561) 744-9516 or roy@smartplaninvesting.com. There is no charge for a copy of the Disclosure Brochure.

Additional information about SmartPlan Investing is available on the SEC’s website at www.adviserinfo.sec.gov.

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Advisory Business

Financial Planning Counselors, Inc. is a privately held corporation organized in 1968 and operating in Florida since 1983. Financial Planning Counselors, Inc. conducts business as SmartPlan Investing and provides investment advisory services as a Florida-registered investment adviser¹ since 2002. Roy E. Wiley is President, Compliance Officer, and owner of the firm.

At SmartPlan Investing, our objective is to coach you to invest your assets following academic investing principles with a goal of meeting your investment objectives and financial needs.

Financial Coaching

We provide financial coaching on matters involving securities as well as non-securities topics, such as tax planning. First, we meet with you to discuss your current financial and investment objectives, investment experience, and goals. With information you provide, we prepare a brief analysis to help you decide how your present financial situation meets your financial goals. Then, if you would like a more thorough analysis and recommendations from us, we will prepare the *MRI*. This presents you with an assessment of your investment portfolio in terms of portfolio risk, volatility, diversification factors, cost, and overall portfolio effectiveness. For businesses who are interested in an analysis their employee retirement plans, we also prepare an *MRI*. The analysis advises fiduciaries in analyzing how well their organization meets a fiduciary standard of excellence and in improving their long-term investment performance.

We will make recommendations for implementing the investment advice we give you. You are under no obligation to act on our recommendations. Moreover, if you elect to act on any of our recommendations, there is no obligation to affect the transaction through any company recommended. Our recommendations are based on your financial situation at the time the analysis is presented and based on financial information disclosed by you. Certain assumptions are made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is in no way an indication of future performance. We do not offer any guarantees or promises that your financial goals and objectives will be met.

¹ Registration as an investment adviser does not imply a certain level of skill or training.

Investment Consulting and Monitoring Services

SmartPlan Investing has entered into a Co-Advisor Agreement with Matson Money, Inc. (“Matson Money”), an investment advisor registered with the U.S. Securities and Exchange Commission. SmartPlan Investing and Matson Money are not related entities; neither has an ownership interest in the other, nor does any member or shareholder of either entity own an interest in the other. Under this agreement with Matson Money, SmartPlan Investing provides to Investment Consulting and Monitoring Services to you. These services include the following:

- Advice on asset allocation;²
- Recommendations on an investment strategy.
- Assistance in the preparation of an investment policy statement and any restrictions.
- Evaluation of each client’s historical investment performance.
- Performance monitoring; and
- Controlling and measuring investment expenses.

If you choose to go forward with these services, you will enter into a three-party investment management agreement with SmartPlan Investing and Matson Money. Under this agreement, Matson Money has full discretionary authority to supervise and direct your investment accounts in accordance with the investment objective for each account. Matson Money makes and implements investment decisions without prior consultation with you, except for any restrictions you provide to Matson Money in writing.

Matson Money’s services are provided through its Matson Fund Platform³ and Frontier Adjusted Portfolio Program. In these programs, Matson Money allocates assets to, and invests your accounts primarily in shares of any one or a combination of series of the “Matson Money, Inc. Family of Funds of The RBB Fund, Inc.” (“Matson Fund”), a no-load mutual fund affiliated with Matson Money. Each series of the Matson Fund is advised by Matson Money and sub-advised by Dimensional Fund Advisors, Inc. (“DFA”), and Blackrock, both are unaffiliated, registered investment advisers. Each series is also a “fund of funds” which invests primarily in shares of other mutual funds.

² Our advice on securities is limited to investments in mutual funds.

³ A program offered by Matson, Private Account Asset Allocation, is no longer available from Matson to new clients. Our clients who participated in this program continue to participate in order to avoid adverse tax consequences that they may incur if they changed to another program.

More specifically, the series invest primarily in no-load mutual funds managed by DFA. DFA, as sub-adviser to each series, selects the underlying DFA mutual funds based on the investment characteristics specified by Matson Money and described in the Matson Money prospectus. Each series is designed to target specified percentages of certain asset classes in each series' applicable investment category to seek maximum portfolio diversification, enhanced return opportunities and diminished portfolio volatility. Matson Money reserves the right, in its sole discretion, to create, and allocate assets in client accounts to, additional series of the Matson Fund in the future. Matson Money may also invest your assets in unaffiliated cash sweep vehicles for temporary or other defensive purposes. BlackRock provides limited assistance in researching iShares ETFs for use in Matson investment strategies. In addition, both firms may also provide certain assistance in our marketing efforts. None of the assistance provided by BlackRock or DFA is dependent upon us investing a specified number of Clients' assets in BlackRock ETFs or DFA managed funds.

We recommend Matson Money's programs because they typically allocate your assets among various asset class funds, in accordance with your goals, financial situation and investment constraints.

We will provide you with Matson Money's disclosure brochure that discusses services, fees, types of investments, and allocation models, among other things. We encourage you to read Matson Money's disclosure brochure and the mutual fund prospectuses. If you have any questions, we will be happy to answer them. If you agree and choose to proceed, we will explain and assist you with the paperwork required to open an account. We will help you determine the appropriate allocation model as well as act as a liaison between you and Matson Money. Ongoing, we will review your account activity on a regular basis and not less than annually, meet with you to re-assess your financial situation and report any changes to Matson Money.

Investor Education Events

We also offer our expertise through educational financial workshops. These workshops are presented individually or in groups, usually monthly. Our presentations focus on a variety of issues, such as investments, financial planning, qualified retirement plans, and success coaching.

Fees and Compensation

Financial Coaching and Investor Education Events

There is no fee charged for an initial consultation, or the *Investor Inventory*. Our Investor Education Events are normally no fee. The charge to prepare the *Free Market Investment Analysis* (MRI) or the *Free Market Fiduciary Investment Analysis* (MRI) is negotiable and ranges between \$250 and \$1000, payable in advance, and may be paid by check or credit card. However, if the account is a 401k at someone's current employer and an analysis requested then the cost is usually between \$250 and \$1000, payable in advance, and may be paid by check or credit card. While this charge is negotiable, it is not refundable once we have started to prepare the analysis. There is no charge for setting up the client's website on Matson Money Blue (E*Money). For financial planning we would charge a mutually agreed amount that would depend on the work and complexity involved

Investment Management Fees

The Matson Fund Platform and Frontier Adjusted Portfolio Program Fees

Your investments in Matson Funds are subject to embedded advisory and other fees and expenses, as described in each fund's prospectus. When you participate in a Matson Money program, ultimately your investments bear all fund-related fees and expenses, including brokerage fees and operating expenses. Matson Money receives fees of .50% on each fund's average daily net assets as described in the prospectus. Dimensional Fund Advisors ("DFA"), a sub-adviser to Matson Money, also receives a sub-advisory fee from each fund. No sales loads are paid to Matson Money, DFA, SmartPlan Investing, or any other parties with respect to fund investments.

Annual fees paid to SmartPlan Investing are:

<u>Total Assets under Management</u>	<u>Maximum Annual Fee</u>
First \$500,000	0.99%
Next \$500,000	0.99%
Next \$3,000,000	0.75%
Over \$4,000,000	0.50%

Fees are negotiable.

Matson Money bills fees, quarterly, in advance, at one-fourth of the annual rate. The fees are based on the market value of your account on the last business day of the preceding calendar quarter. You will find the market value of your account on the statement you receive from the custodian carrying your account and on statements provided by Matson Money. The initial fee is due at the time your account is funded and is pro-rated for the number of days remaining in the quarter. The custodian of your assets will deduct the fees from your account and send the fees to Matson.

Clients who invest in Matson Funds through different co-advisers may pay lower or higher fees to their co-adviser than other investors in the same funds.

Matson Money⁴ withdraws your fees automatically from your account. Matson Money pays SmartPlan Investing directly. SmartPlan Investing will not, and has no authority to, withdraw fees from your account. With prior notice, Matson Money is willing to permit you to pay the advisory fees directly to SmartPlan Investing. Fees compensate SmartPlan Investing for maintaining a relationship with you, ensuring that information about your specific goals, financial situation and investment constraints remain up-to-date, and responding to your inquiries. Matson Money receives no part of these fees.

Other Charges

All management fees are separate from charges assessed by third parties, such as broker/dealers, custodians, mutual fund companies, etc. Each rebalancing or reallocation of your portfolio may involve transaction charges imposed by the custodian. Brokerage and other transaction costs charged by broker/dealers executing the transactions and custodians maintaining your assets are in addition to the management fees and are non-negotiable. Mutual funds, variable annuities or other platforms may assess other fees and expenses, such as 12B-1 fees and/or commissions in connection with the placement of your funds into certain investments. SmartPlan Investing does not receive any of these commissions, charges, and/or fees. Our representatives may receive commissions from insurance products purchased by you. See “*Other Financial Industry Activities and Affiliations*” below for more details.

⁴

In the case of ERISA accounts, your custodian withdraws the fee.

General Information

You have the right to terminate your agreement with SmartPlan Investing and/or Matson Money without penalty within five (5) business days. Otherwise, your agreement may be terminated by any of the parties by giving 30 days prior written notice to the other.

Prepaid fees will be refunded by Matson on a pro-rata basis.

Depending on individual arrangements made, fees paid by one client may be higher or lower than fees paid by another client under similar circumstances. Advice provided by SmartPlan Investing may differ from one client to another.

The fees charged are calculated as described above and are not charged based on a share of capital gains upon, or capital appreciation of, the funds, or any portion of the funds of an advisory client.

SmartPlan Investing and its representatives do not represent, warranty, or imply that any services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections.

Performance-Based Fees and Side-By-Side Management

We do not accept performance-based fees – that is, fees based on a share of capital gains or appreciation of the assets of a client. We do not participate in side-by-side management. Side-by-side management refers to the practice charging performance-based fees for account management while at the same time managing accounts that are not charged performance-based fees.

Types of Clients

We provide our advisory services to individual investors, high net worth investors, pension and profit-sharing accounts, corporations, and other business entities. There is no minimum net worth or minimum portfolio requirement for our financial coaching services. While we do not have any requirements for opening or maintaining an account, participation in the Matson Fund Platform and Frontier Adjusted Portfolios have no minimum investment.

Methods of Analysis, Investment Strategies, and Risk of Loss

We understand that Matson Money utilizes Modern Portfolio Theory and the Efficient Market Philosophy to create and manage portfolios that fall on the efficient frontier.

These portfolios are reviewed typically on a quarterly basis and rebalanced as needed. Matson Money does not make asset allocation decisions based on the conditions of the economy or the market, but rather on economic research related to the way various asset classes have performed and the correlation of their performance over time.

Investment strategies are dictated by Matson Money within the asset allocation models and underlying mutual funds. Matson Money may use variable annuities or other insurance products. Asset allocation with quarterly rebalancing is typical but may be more or less frequent depending upon the particular portfolio manager's strategies and/or market conditions.

Investing in securities involves risk of loss that you should be prepared to bear. Investment values will fluctuate, are subject to market volatility, and may be worth more or less than original cost. Typically, Matson Money requests clients to sell securities in order to make funds available to purchase the mutual funds or other commingled investment vehicles Matson Money recommends. In those situations where there would be adverse tax consequences to a client, Matson Money may recommend the client hold the security or sell it over time in a tax efficient manner.

Disciplinary Information

We are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of SmartPlan Investing or the integrity of our management. We have no information that applies to this item.

Other Financial Industry Activities and Affiliations

We are required to disclose material relationships that we may have with related financial industry participants.

Currently, we recommend only one portfolio manager, Matson Money. However, we reserve the right to change if we believe there is a more appropriate choice in the future. Other portfolio managers may use similar strategies as Matson Money, may cost more or less than Matson Money, may minimize overall portfolio turnover, or may have investment philosophies like our own. We are required to put your interests before our own interests. Consequently, we have implemented these procedures to make sure that you benefit from using our recommended portfolio managers: (1) We gather detailed

information from you to determine if you will benefit more from using Matson Money, rather than another portfolio manager. (2) Ongoing, we review Matson Money's performance and handling of your portfolio. (3) We review other portfolio managers' programs to become familiar with alternatives that may be appropriate for you.

An affiliate of SmartPlan Investing, Covenant Financial, Inc., DBA SmartPlan Financial Services, is an accounting firm and our owner, Mr. Wiley is a certified public accountant, is a shareholder of the firm providing tax and accounting services to individuals and business clients not considered investment advisory in nature. Mr. Wiley devotes approximately 1% of his time to duties other than giving investment advice. These duties include providing operational oversight, other managerial duties, and providing additional services as an accountant.

Additionally, we have a fiduciary responsibility to our clients. This fiduciary responsibility requires us to put your interests before our own or anyone else's interests. We have developed concrete procedures to reduce the potential for any conflict that may arise and adopted a Code of Ethics (see "*Code of Ethics, Participation or Interest in Client Transactions and Personal Trading*" below).

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

SmartPlan Investing has adopted a formal Code of Ethics. This Code of Ethics includes requirements to make sure that we meet our fiduciary responsibilities:

1. We will put your interests before our interests.
2. You have the right to specify your investment objectives, guidelines, and/or conditions on the overall management of your account.
3. We will not make investment decisions for our personal portfolios if the decision is based on information that is not also available to the investing public.
4. We will not participate in private placements or initial public offerings (IPO's) that may affect your investments without disclosure to you.
5. We always make every effort to comply with all applicable federal and state regulations governing registered investment advisers.

The full text of our Code of Ethics is available to you on request.

On occasion, we may buy or sell securities that we recommend to clients. This practice would create a conflict of interest if the transactions were structured to trade on the market impact caused by recommendations made to our clients. Our clients' transactions and our own transactions usually trade in sufficiently broad markets where these transactions will not have an appreciable impact on the securities' market value. Mr. Wiley reviews all personal transactions quarterly to make sure that personal transactions are consistent with advice given to clients.

Brokerage Practices

Selection of Brokerage and Custodial Services

SmartPlan Investing does not recommend brokerage firms for client transactions. If you are investing in one of the programs managed by Matson Money, Matson Money requires that you open your custodial accounts with one of the custodians selected by Matson Money. Client choices may depend on whether your accounts are subject to the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). Matson Money generally requests that clients with non-ERISA accounts custody the assets they will manage with either E*Trade Advisor Services ("TCA"), Charles Schwab Company ("Schwab") and/or Pershing, LLC (Pershing Advisor Solutions) ("Pershing").

For Client accounts subject to ERISA, assets must generally be custodied at Matrix Trust Company (f/k/a TD Ameritrade Trust Company) ("TD Ameritrade") or Charles Schwab Trust and either Aspire or Alliance Benefit Group must serve as their recordkeeper. Clients may also use Professional Capital Services ("PCS") another Matson Money ERISA recordkeeper and account administrator. Additionally, 401(k) accounts may select E*Trade Advisor Services as their custodian and recordkeeper. E*Trade uses PCS as their recordkeeping service provider. For 403(b) accounts as well as some 401(k) accounts clients may select MG Trust (also known as Matrix Trust Company) as the custodian and Aspire as their recordkeeper. In addition to participating in the 403(b) markets of states that do not require pre-approval. The Free Market Funds have been approved by the states of California and Texas to serve as investment vehicles for the 403(b) plans of the state and local government entities organized in those states.

Generally, assets transferred to Client accounts are begun to be invested as soon as sufficient assets are received by the custodian. Although Clients may deposit or transfer freely-tradable securities into their accounts, they will be liquidated and the proceeds

invested in securities matching the Client's investment strategy. There may be tax consequences associated with this liquidation and reinvestment process. Clients should consult with their tax professionals before depositing securities in accounts we manage on their behalf.

Review of Accounts

Our representatives review client accounts periodically and at least annually. Third party portfolio managers, such as Matson Money, monitor accounts daily for trading and rebalancing purposes. We do not provide regular written reports but rely on Matson Money to provide reports to you on a quarterly basis. The mutual fund managers and/or the custodian handling your account(s) send you account statements at least quarterly as well. These account statements show money balances, investment values, and transactions. Account activity, positions, and account balances are available for view 24 hours a day on Matson Money's web site.

Client Referrals and Other Compensation

Matson Money may provide educational and client coaching products to SmartPlan Investing. These products include pamphlets, books, audio compact disks, DVDs and downloadable audio and/or video files of Matson Money / McGriff Production films and/or other media. SmartPlan Investing is required to attend Matson Money – produced training conferences, some of which rely on these educational products. Some of the materials are purchased and some marketing assistance is provided without charge. Matson Money also provides their investment advisory services to advisers and their representatives, at low or no cost and at reduced costs to family members. See *Other Financial Industry Activities and Affiliations* above for a description of our procedures addressing potential conflicts when recommending Matson Money.

Client Appreciation – We may invite clients to bring guests to a periodic customer appreciation dinner or seminar. If the guest becomes our client, it could be construed that the client bringing the guest was compensated by a meal.

Matson Money Blue, an E*money-hosted Data Consolidation Platform

SmartPlan Investing through Matson Money provides Clients with on-line access to their Matson Money account statements and other Client account information. In addition,

Matson Money also provides, through eMoney Advisor , LLC (eMoney), its Matson Money Blue service, a web based platform for the consolidation and maintenance of personal financial information, including bank, brokerage, insurance and managed account statements plus legal documents like wills, trusts, guardianship and other materials in a single location. As noted on its website, eMoney provides financial advisers and their clients with “Client data aggregation, needs-based analysis, on-line document storage, and marketing communication tools” all in a single platform (emoneyadvisor.com). SmartPlan Investing has chosen to access Matson Money Blue by reimbursing Matson Money for access to the platform at a reduced rate from revenues received for managing Client accounts. In either case, Clients of SmartPlan Investing who participate in the program will have free access to their own data storage space with no increase in existing advisory fees. This program creates an inherent potential conflict of interest because of SmartPlan’s ability to see a complete picture of each participating Client’s assets, including potential access to Client’s nonpublic personal information that is not in their on-line document storage. In addition, Matson Money warns Clients not to provide Referrers with their personal log in or password credentials for this platform or for any asset-bearing account the statements for which may be stored on the platform.

Clients who choose to participate in the data storage platform should understand that if SmartPlan Investing were to leave the Matson Money program, whether voluntarily or involuntarily, SmartPlan will not be permitted to access or move any Client data upon termination. Clients, if SmartPlan Investing were to leave the Matson program will be able to continue to access their stored data as long as they remain Clients of Matson Money by entering into a relationship with a new Referrer. Clients who choose to terminate their relationship with Matson Money at any time for any reason may seek continued access to their data directly from eMoney. Since the data platform is maintained by eMoney, not by SmartPlan Investing or Matson Money, we are unable to provide either electronic or hard copy downloads of documents to former Clients. However, it is Matson Money’s understanding that eMoney will, upon written request from a Client, transfer Client’s stored data electronically to another money manager if such manager has entered into an agreement with eMoney to provide its own clients with a data storage platform, and such data is still stored by eMoney. If no such relationship exists, we understand that eMoney will provide former Clients with a hard copy of their personal data upon written request in accordance with applicable law assuming that the

information is still stored on the eMoney platform. However, neither SmartPlan Investing nor Matson Money will be responsible for any fees associated with former Clients' requests to eMoney to move their stored documents, whether in electronic or hard copy format, upon termination of their relationship with us.

Custody

You will not give us authority to withdraw securities or funds from your account. Your funds and securities will be held with a bank, broker/dealer, or other independent qualified custodian. We do not accept physical custody of any of your funds and/or securities. We do not accept or forward securities certificates to your custodian. We do not produce account statements. You will receive account statements from the custodian holding your funds and securities at least quarterly. Please review account statements for accuracy and let us know if there are any discrepancies.

Investment Discretion

We do not exercise investment discretion on your behalf.

Voting Client Securities

Your custodian may send proxies or other solicitations about your securities directly to you. We do not accept authority to vote securities on your behalf.

Financial Information

SmartPlan Investing does not require the prepayment of fees in excess of \$500 and more than six months in advance and does not have discretionary authority over, or custody of, client funds and securities. SmartPlan Investing has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients nor has it been the subject of a bankruptcy proceeding.

In December 2019, an outbreak of a novel strain of coronavirus (COVID-19) originated in Wuhan, China and has since spread to other countries, including the U.S. On March 11, 2020, the World Health Organization characterized COVID-19 as a pandemic. The COVID-19 outbreak in the United States has caused business disruption through mandated and voluntary closings of multiple businesses. While the disruption is currently expected to be temporary, there is considerable uncertainty around the duration of the closings. Therefore,

SmartPlan Investing expects this matter to negatively impact its operating results. However, the related financial impact and duration cannot be reasonably estimated at this time. SmartPlan Investing applied for and was approved a loan under the Paycheck Protection Program established under the Coronavirus Aid, Relief and Economic Security Act (“CARES ACT”) and administered by the Small Business Administration. The loan does not materially impact our advisory relationships with clients, nor does it impair our ability to meet contractual obligations and fiduciary commitments to clients. The loan was taken to pay the salaries of operations staff and individuals who are primarily responsible for performing advisory functions for our clients. SmartPlan Investing is eligible for loan forgiveness of up to 100% of the loan, upon meeting certain requirements. SmartPlan Investing believes it will meet the forgiveness requirements.

Requirements for State-Registered Advisers

Principal Executive Officers

Roy E. Wiley, President and Compliance Officer

See attached Form ADV Part 2B – Brochure Supplement for information about Mr. Wiley.

Other Business Activities

See “Other Financial Industries Activities and Affiliations” above.

Calculation of Performance-Based Fees

This item does not apply to SmartPlan Investing or to Mr. Wiley.

Arbitration, Civil Suits, Etc.

This item does not apply to SmartPlan Investing or to Mr. Wiley.

Relationships or Arrangements with Issuers

This item does not apply to SmartPlan Investing or to Mr. Wiley.

Bankruptcy

This item does not apply to SmartPlan Investing or to Mr. Wiley.

Brochure Supplement (Form ADV, Part 2B)

Jennifer Foster

**Financial Planning Counselors, Inc.
DBA SmartPlan Investing**

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June 15, 2020

This brochure provides information about Jennifer Foster that supplements the SmartPlan Investing brochure. You should have received a copy of that brochure. Please contact Jennifer Foster at (561) 744-9516 if you did not receive SmartPlan Investing's brochure or if you have any questions about the contents of this supplement.

Additional information about Jennifer Foster is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Jennifer Marie Foster

Year of Birth: 1976

Formal Education after High School:

- Palm Beach State College 2000 - 2003

Business Background for the Preceding Five Years:

- SmartPlan Investing, Admin Assistant and Investment Coordinator 2004 - Present
- Covenant Financial & Tax, Inc. DBA SmartPlan Financial Services, Admin Assistant 2004 -2013

Jennifer Foster is an Investment Advisor Representative. An Investment Advisor Representative is licensed and regulated by their state. While state laws and regulations vary, the education, experience, and testing requirements for licensure as an Investment Advisor Representative include passing of the vigorous Series 65 exam.

Disciplinary Information

This item does not apply to Jennifer Foster.

Other Business Activities

This item does not apply to Jennifer Foster.

Additional Compensation

Jennifer Foster does not receive any additional compensation from non-clients for providing advisory services.

Supervision

Jennifer Foster's supervisor is Roy E. Wiley, President and Compliance Officer (561-744-9516). Roy E. Wiley reviews Ms. Foster's client account activities, correspondence, transactions, and personal securities transactions regularly for inappropriate actions.

Requirements for State-Registered Advisers

Arbitration Claims, Civil, Self-Regulatory Organization, or Administrative Proceedings, and Bankruptcy

These items do not apply to Ms. Foster.

Brochure Supplement (Form ADV, Part 2B)

Joshua B. Helman

**Financial Planning Counselors, Inc.
DBA SmartPlan Investing**

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June 15, 2020

This brochure provides information about Joshua B. Helman that supplements the SmartPlan Investing brochure. You should have received a copy of that brochure. Please contact Roy Wiley, President, at (561) 744-9516 if you did not receive SmartPlan Investing's brochure or if you have any questions about the contents of this supplement.

Additional information about Joshua B. Helman is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Joshua B. Helman

Year of Birth: 1966

Formal Education after High School:

- Harvard Medical School, 1993
- Harvard University, 1988

Business Background for the Preceding Five Years:

- SmartPlan Investing, Investment Adviser Representative, 2007 - Present
- University of Florida, Physician, 2004 - Present

Disciplinary Information

This item does not apply to Dr. Helman.

Other Business Activities

Dr. Helman's duties at the University of Florida account for a substantial amount of his time and income but are unrelated to his duties as an IAR of SmartPlan Investing.

In addition, Dr. Helman is a licensed insurance agent who may sell insurance products to advisory clients. Commissions are earned on the sale of insurance products. If Dr. Helman recommends insurance products to you, you are under no obligation to purchase the products through him. Even though this may be a potential conflict of interest, we believe insurance products complement and enhance advisory services. Before you purchase insurance based on Dr. Helman's recommendation, he will explain to you the reasons for the recommendation and provide you with details regarding his compensation.

Additional Compensation

Dr. Helman does not receive any additional compensation from non-clients for providing advisory services.

Supervision

Dr. Helman's supervisor is Roy E. Wiley, President and Compliance Officer (561-744-9516). Roy E. Wiley reviews Dr. Helman's account activities, correspondence, transactions, and personal securities transactions regularly for inappropriate actions.

Requirements for State-Registered Advisers

Arbitration Claims, Civil, Self-Regulatory Organization, or Administrative Proceedings, and Bankruptcy

These items do not apply to Dr. Helman.

Brochure Supplement (Form ADV, Part 2B)

Mathew E. Kotecki

**Financial Planning Counselors, Inc.
DBA SmartPlan Investing**

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June 15, 2020

This brochure provides information about Mathew E. Kotecki that supplements the SmartPlan Investing brochure. You should have received a copy of that brochure. Please contact Roy Wiley, President, at (561) 744-9516 if you did not receive SmartPlan Investing's brochure or if you have any questions about the contents of /this supplement.

Additional information about Mathew E. Kotecki is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Mathew E. Kotecki

Year of Birth: 1983

Formal Education after High School:

- Florida Institute of Technology

Business Background for the Preceding Five Years:

- SmartPlan Investing, Investment Adviser Representative, 2015 - Present
- Willis Marine, Inc., Naval Architect, 2006 – Present
- America Light, Design Engineer, 2010 - 2012

Disciplinary Information

This item does not apply to Mr. Kotecki.

Other Business Activities

Mr. Kotecki is employed by Willis Marine, Inc. as a Naval Architect. Presently, this activity involves a substantial amount of his time and income but are unrelated to his duties as an IAR of SmartPlan Investing.

Additional Compensation

Mr. Kotecki does not receive any additional compensation from non-clients for providing advisory services.

Supervision

Mr. Kotecki's supervisor is Roy E. Wiley, President and Compliance Officer (561-744-9516). Roy E. Wiley reviews Mr. Kotecki's client account activities, correspondence, transactions, and personal securities transactions regularly for inappropriate actions.

Requirements for State-Registered Advisers

Arbitration Claims, Civil, Self-Regulatory Organization, or Administrative Proceedings, and Bankruptcy

These items do not apply to Mr. Kotecki.

Brochure Supplement (Form ADV, Part 2B)

Keith Stacy

**Financial Planning Counselors, Inc.
DBA SmartPlan Investing**

711 W. Indiantown Road, Suite C5

Jupiter, FL 33458

(561) 744-9516

www.smartplaninvesting.com

June 15, 2020

This brochure provides information about Keith Stacy that supplements the SmartPlan Investing brochure. You should have received a copy of that brochure. Please contact Mr. Stacy at (561) 744-9516 if you did not receive SmartPlan Investing's brochure or if you have any questions about the contents of this supplement.

Additional information about Keith Stacy is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Keith Stacy

Year of Birth: 1996

Formal Education after High School:

- BA, Liberal Arts with a Concentration in Economics, Florida Atlantic University, 2019

Business Background for the Preceding Five Years:

- SmartPlan Investing, Investment Advisor Representative, Jupiter, FL – 06/2020 to Present
- SmartPlan Investing, Admin Assistant, Jupiter, FL – 05/2019 to Present
- Florida Atlantic University, Full-Time Student, Jupiter, FL – 08/2015 – 05/2019
- Florida Atlantic University, Economics Tutor, Jupiter, FL – 10/2017 – 12/2018
- Christ Fellowship Church, Accounts Payable Intern, Palm Beach Gardens, FL – 05/2017 – 08/2017
- Demeter Research, Marketing Intern, Jupiter, FL 05/2016 – 08/2016

Disciplinary Information

This item does not apply to Mr. Stacy

Other Business Activities

Mr. Stacy is not involved in other business activities.

Additional Compensation

Mr. Stacy does not receive any additional compensation from non-clients for providing advisory services.

Supervision

Mr. Stacy's direct supervisor is Roy E. Wiley, President and Compliance Officer (561-744-9516). Roy E. Wiley reviews Mr. Stacy's client account activities, correspondence, transactions, and personal securities transactions regularly for inappropriate actions.

Requirements for State-Registered Advisers

Arbitration Claims, Civil, Self-Regulatory Organization, or Administrative Proceedings, and Bankruptcy

These items do not apply to Mr. Stacy.

Brochure Supplement (Form ADV, Part 2B)

Robroy Wiley

**Financial Planning Counselors, Inc.
DBA SmartPlan Investing**

2744 Archway Drive
Atlanta, GA 30341
(770)-450-6625

Main Office: 711 W. Indiantown Road, Suite C5

Jupiter, FL 33458

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June 15, 2020

This brochure provides information about Robroy Wiley that supplements the SmartPlan Investing brochure. You should have received a copy of that brochure. Please contact Roy Wiley, President, at (561) 744-9516 if you did not receive SmartPlan Investing's brochure or if you have any questions about the contents of /this supplement.

Additional information about Robroy Wiley is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Robroy Wiley

Year of Birth: 1972

Formal Education after High School:

- Georgia State University, BBA-Finance, 2006

Business Background for the Preceding Five Years:

- SmartPlan Investing, Investment Adviser Representative, 2013 - Present
- Rooms To Go, Visual Merchandiser, 2006 – 2015
- SmartPlan Investing, Social Media Consultant, 2011 - Present

Disciplinary Information

This item does not apply to Mr. Wiley.

Other Business Activities

Mr. Wiley has no other business activities.

Additional Compensation

Mr. Wiley does not receive any additional compensation from non-clients for providing advisory services.

Supervision

Mr. Wiley's supervisor is Roy E. Wiley, President and Compliance Officer (561-744-9516). Roy E. Wiley reviews Robroy Wiley's client account activities, correspondence, transactions, and personal securities transactions regularly for inappropriate actions.

Requirements for State-Registered Advisers

Arbitration Claims, Civil, Self-Regulatory Organization, or Administrative Proceedings, and Bankruptcy

These items do not apply to Mr. Wiley.

Brochure Supplement (Form ADV, Part 2B)

Roy E. Wiley, AIF[®]

**Financial Planning Counselors, Inc.
DBA SmartPlan Investing**

711 W. Indiantown Road, Suite C5

Jupiter, FL 33458

(561) 744-9516

www.smartplaninvesting.com

June 15, 2020

This brochure provides information about Roy E. Wiley, AIF[®] that supplements the SmartPlan Investing brochure. You should have received a copy of that brochure. Please contact Mr. Wiley at (561) 744-9516 if you did not receive SmartPlan Investing's brochure or if you have any questions about the contents of this supplement.

Additional information about Roy E. Wiley, AIF[®] is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Roy E. Wiley, AIF®

Year of Birth: 1945

Formal Education after High School:

- BBA Florida Atlantic University, 1974

Business Background for the Preceding Five Years:

- SmartPlan Investing, President, Compliance Officer and IAR, 2004 – Present
Owner 2011 - Present
- Covenant Financial & Tax, Inc. DBA SmartPlan Financial Services, Partner
Owner, 1992 - Present
- Roy E. Wiley, CPA, 1976 – Present

Mr. Wiley holds credentials as a Certified Public Accountant (CPA) from American Institute of Certified Public Accountants. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience, and testing requirements for licensure as a CPA generally include minimum college education, minimum experience levels, and successful passage of the Uniform CPA Examination. To maintain a CPA license, Mr. Wiley is required to complete eighty hours of continuing professional education every two years.

In addition, Mr. Wiley is an Accredited Investment Fiduciary® (AIF®). The AIF designation certifies that he has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF® designation, Mr. Wiley completed a training program, successfully passed a comprehensive, closed-book final examination under the supervision of a proctor and agreed to abide by the AIF®, Code of Ethics. To maintain the AIF®, designation, he must annually renew his affirmation of the AIF®, Code of Ethics and complete six hours of continuing education credits. The certification is administered by The Center for Fiduciary Studies, LLC (a Fiduciary360 (fi360) company).

Disciplinary Information

This item does not apply to Mr. Wiley.

Other Business Activities

Mr. Wiley's activities as a certified public accountant and shareholder of Covenant Financial dba Wiley CPA and involves about 1 hour of his time each month.

Additional Compensation

Mr. Wiley does not receive any additional compensation from non-clients for providing advisory services.

Supervision

There are no supervisors senior to Mr. Wiley. Mr. Wiley is responsible for his own supervision. He adheres to high standards of ethical behavior required by our Code of Ethics.

Requirements for State-Registered Advisers

Arbitration Claims, Civil, Self-Regulatory Organization, or Administrative Proceedings, and Bankruptcy

These items do not apply to Mr. Wiley.