

Item 1 – Cover Page

**Form ADV Part 2A
Disclosure Brochure**

Vickery Financial Services, Inc.

CRD# 149713

190 Hawthorne Park
Athens, Georgia
30606

706.353.2728

www.vickeryfinancial.com

March 30, 2016

This brochure provides information about the qualifications and business practices of Vickery Financial Services, Inc. If you have any questions about the contents of this brochure, please contact us at (706) 353-2728. 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.

Vickery Financial Services, Inc. is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you determine to hire or retain an adviser.

Additional information about Vickery Financial Services, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Summary of Material Changes

This Brochure is prepared in the revised format required beginning in 2011. Registered Investment Advisers are required to use this format to inform clients of the nature of advisory services provided, types of clients served, fees charged, potential conflicts of interest and other information. The Brochure requirements include the annual provision of a Summary of Material Changes (the “Summary”) reflecting any material changes to our policies, practices, or conflicts of interest made since our last required “annual update” filing. In the event of any material changes, such Summary is provided to all clients within 120 days of our fiscal year-end. Our last annual update was filed on March 27, 2015. Of course the complete Brochure is available to clients at any time upon request.

Our current brochure may be requested by contacting Charles J. Vickery, President and Chief Compliance Officer at 706.353.2728 or chuck@vickeryfinancial.com. We will provide you with a brochure at any time without charge.

Additional information about us and about persons affiliated with us who are registered as our investment advisory representatives (“your advisory representative”) is also available via the SEC’s website, at www.adviserinfo.sec.gov. Information regarding your advisory representative can also be found in the supplements to this brochure.

Item 3 - Table of Contents

	Page
Item 1 – Cover Page.....	1
Item 2 - Summary of 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	8
Item 7 – Types of Clients	8
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss	9
Item 9 - Disciplinary Information.....	11
Item 10 - Other Financial Industry Activities and Affiliations	11
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading..	12
Item 12 - Brokerage Practices.....	13
Item 13 - Review of Accounts.....	16
Item 14 - Client Referrals and Other Compensation.....	17
Item 15 - Custody	17
Item 16 - Investment Discretion.....	17
Item 17 - Voting Client Securities	17
Item 18 - Financial Information	18
Brochure Supplements	

Item 4 - Advisory Business

Vickery Financial Services, Inc. (“Vickery Financial,” we, us, ours) is a corporation organized under the laws of the State of Georgia. Vickery Financial provides investment management and wealth planning services and is registered as an investment adviser with the U.S. Securities and Exchange Commission (“SEC”).

Charles J. Vickery founded the Athens-based investment advisory firm in 1982 and is the principal owner. Deanne S. Rosso is also a co-owner of the firm. Please see *Brochure Supplement(s)* for more information on these owners and other individuals who formulate investment advice and have direct contact with clients, or have discretionary authority over client accounts.

As of December 31, 2015, Vickery Financial managed \$166,243,526 of assets on a non-discretionary basis and no assets on a discretionary basis. We also provided consulting or other advice on \$16,632,340 in assets over which we did not exercise direct investment authority

Investment Management Services

At the outset of each client relationship, Vickery Financial spends time with the client, asking questions, discussing the client’s investment experience and financial circumstances, and reviewing investment options for the client. In designing your investment portfolio, Vickery Financial considers the following factors, without limitation:

- financial situation,
- risk tolerance,
- investment horizon,
- liquidity needs,
- tax considerations,
- investment objectives, and
- any other issues important to your state of affairs.

We select securities based on your goals and risk tolerance level. Once these are identified, we will customize a portfolio for you. In creating the portfolio, we seek to combine multiple asset classes that have historically experienced dissimilar return patterns across various financial and economic environments. Potential assets for the portfolio are evaluated not by individual characteristics but by their effect on the overall portfolio. Portfolios are generally comprised of mutual funds and exchange traded funds that invest in domestic and foreign equities as well as fixed income securities.

Your account should reflect your unique situation. Individual, customized portfolios vary in terms of composition and asset class weighting, but they all share the goal of capturing market returns while minimizing volatility for the selected level of risk.

We will also provide investment management and retirement plan consulting services to you for retirement plan accounts such as 401(k), 403(b) and 457 accounts. Within these accounts, we will review available investment options to help you determine a suitable investment mix designed to achieve stated goals and investment objectives. These accounts are generally maintained at a custodian selected by the plan sponsor.

You should notify us promptly if there are any changes in your financial situation or investment objectives or if you wish to impose any reasonable restrictions upon the management of your account.

Vickery Financial generally recommends the services of LWI Financial, Inc. (“Loring Ward”) to assist us in managing your account. Loring Ward is registered as an investment adviser with the SEC, and securities may be offered through its affiliate, Loring Ward Securities, Inc. a registered broker dealer and FINRA/SIPC member firm. Loring Ward is an independent third-party account administrator and investment adviser. Ours is a contractual relationship; Loring Ward and Vickery Financial are not affiliated.

Clients generally participate in the *Structured Investing Program* administered through Loring Ward. Certain legacy clients may also participate in Loring Ward’s *Structured Investing Advantage Program*. These programs are similar but have different fee structures and investment offerings. We typically recommend the *Structured Investing Program* to our new advisory clients.

Portfolio management services are offered to you on a nondiscretionary basis. You may provide standing orders to have your account rebalanced in accordance with pre-determined asset allocations. Restrictions and guidelines imposed by you may adversely affect the composition and performance of portfolios. For this reason, performance of portfolios within the same investment objective may differ.

Wealth Planning Services

Vickery Financial offers separate wealth planning services under a Financial Planning Agreement. This service may be provided as a stand-alone service, or may be coupled with ongoing portfolio management. The preparation of such a plan may necessitate that you provide us with personal data such as family records, budgeting, personal liability, estate information and additional financial goals. The wealth management plan may include, but is not limited to:

- Wealth Preservation,
- Wealth Enhancement (Tax Mitigation),
- Wealth Transfer,
- Wealth Protection; and
- Charitable Gifting.

Once wealth planning advice is given, you may choose to have Vickery Financial implement your wealth plan and manage your investment portfolio on an ongoing basis. However, you are under no obligation to act upon any of the recommendations made by us under a wealth planning engagement and/or to engage the services of any recommended professional.

Educational Seminars

Vickery Financial provides educational seminars on financial topics from time to time. Participants pay a nominal fee to cover the cost of the materials provided.

Item 5 - Fees and Compensation

General Fee Information

Fees paid to Vickery Financial are exclusive of all custodial and transaction costs paid to the client's custodian, brokers or other third party consultants. Please see ***Item 12 – Brokerage Practices*** for additional information. Fees paid to Vickery Financial are also separate and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). You should review all fees charged by funds, brokers, Vickery Financial and others to fully understand the total amount of fees that you may incur for investment and financial-related services.

Investment Management Fees

We offer our investment management services on a fee-only basis. Our fee schedule is described as follows:

<u>Assets Under Management</u>	<u>Advisory Fee^{1,2}</u>
Less than \$250,000	1.65%
\$250,001 to \$499,999	1.55%
\$500,000 to \$999,999	1.40%
\$1,000,000 to \$1,999,999	1.30%
\$2,000,000 to \$4,999,999	1.20%
\$5,000,000 and above	1.05%

¹ All fees are negotiable at our sole discretion.

² Rates shown represent the maximum rates charged for the level of assets under management.

For clients who participate in Loring Ward's *Structured Investing Program*, our advisory fee includes the administrative fees charged by Loring Ward for the services it may provide to your account. In other words, we pay Loring Ward from the advisory fee we collect.

Clients who participate in Loring Ward's *Structured Investing Advantage Program* will be charged our advisory fee and a separate administrative fee by Loring Ward. Such charges are disclosed in our agreement with the client as well as the client's agreement with Loring Ward and are shown on the client's custodial statement.

Broker-dealers and other financial institutions that hold client accounts are referred to as custodians. You must authorize the custodian to deduct our fees from your account. This authorization is granted as part of Loring Ward's advisory agreement. Loring Ward deducts fees from your account and then remits Vickery Financial its advisory fee. Loring Ward will retain its portion of the fees.

More information about Loring Ward and its services and fees can be found in Loring Ward's disclosure brochure and investment management agreement.

Portfolio management fees are generally payable quarterly, in advance. Our fee is calculated based upon the market value of the assets in your account on the last day of the previous quarter. If management begins after the start of a quarter, fees will be prorated accordingly.

We send a billing statement that includes the value of your investments, our advisory fee, and how it is calculated. Your custodian also provides you with statements that show the amount paid directly to us. You should compare the billing statement we send to the custodian's statement and verify the calculation of our fees. The custodian does not verify the accuracy of fee calculation.

Either you or Vickery Financial may terminate the Investment Management Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees will be promptly refunded to you based on the number of days that the account was managed, and any fees due to Vickery Financial from you will be invoiced or deducted from your account prior to termination. Should you terminate the advisory agreement we have entered into within five (5) business days from the date the agreement is executed, you will receive a full refund of any fees paid.

Wealth Planning Services Fees

Wealth planning services are provided under either an hourly or fixed fee arrangement. Vickery Financial's hourly planning rate is \$300. Hourly fees are billable each month as incurred.

Fixed wealth planning fees are individually negotiated and range between \$1,500 and \$5,000 based on the scope and complexity of the arrangement. One-third of the fixed fee is billed upon engagement and the remainder is due upon completion of the plan. All plans are completed in less than six months. Expenses to implement the plan are separate and in addition to the financial planning fee.

If you choose to terminate the agreement during the planning process, you will be billed for time spent and associated expenses up to the termination date at our standard hourly rate then in effect. If the amount paid upon engagement for a fixed fee agreement is greater than the bill for time and expenses, any excess will be refunded to you.

Other Compensation

Our advisory representatives may also be licensed with various insurance companies. Commissions may be earned by our advisory representatives if insurance products are purchased through these insurance companies. To protect client interests, Vickery Financial's policy is to disclose all forms of compensation before any such transaction is executed. Under no circumstance will the client pay both a commission to these advisory representatives and a management fee to Vickery Financial on the same pool of assets.

Item 6 – Performance Based Fees

Performance-based fees are designed to give a portion of the returns of an investment to the investment adviser as a reward for positive performance. The fee is generally a percentage of the profits made on the investments. We do not charge performance-based fees on any of our client accounts.

Item 7 – Types of Clients

We provide advisory services primarily to high net worth individuals, including their trusts, estates, retirement accounts, and private foundations. As a condition for starting and maintaining an advisory relationship, we generally require a minimum portfolio size of \$250,000. We, at our sole discretion, may accept clients with smaller portfolios based upon certain factors including anticipated future earning capacity, anticipated future additional assets, account composition, related accounts, and pre-existing client relationships. We may consider the portfolios of your family members to determine if your portfolio meets the minimum size requirement.

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

Vickery Financial selects institutional level investments in mutual funds and exchange traded funds (“ETFs”) for your portfolios through the use of Loring Ward’s process called “Structured Investing” that is based on 80+ years of Nobel Prize-winning financial, economic and behavioral research. This process incorporates global diversification and regular rebalancing and is engineered, monitored and managed with strict discipline. Once we help you determine an appropriate risk level, we build a customized portfolio that seeks to maximize returns by targeting known risk factors that have historically compensated investors.

This scientific, asset class-based investing approach results in widely diversified portfolios often containing thousands of individual stocks. Additionally, certain groups of securities that do not represent the asset classes we target are eliminated from the portfolio. Our investment strategies generally include long-term purchases and sales.

Mutual funds and ETFs are generally evaluated and selected based on a variety of factors, including, as applicable and without limitation, past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and returns, and other factors. The mutual funds we recommend minimize trading costs through various methods including low- turnover, patient trading, and through the use of lower-cost direct trading platforms wherever possible.

Risk of Loss

While Vickery Financial seeks to diversify clients’ investment portfolios across various asset classes consistent with their Investment Plans in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that client investment portfolios face.

Management Risks. While Vickery Financial manages client investment portfolios, based on Vickery Financial’s experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that Vickery Financial or a Manager allocates client assets to individual securities and/or asset classes that are adversely affected by unanticipated market movements, and the risk that Vickery Financial’s specific investment choices could underperform their relevant indexes.

Risks of Investments in Mutual Funds, ETFs and Other Investment Pools. As described above, Vickery Financial may invest client portfolios in mutual funds, ETFs and other investment pools (“pooled investment funds”). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds’ success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

Equity Market Risks. Vickery Financial will generally invest portions of client assets either directly into equity investments, primarily stocks, or pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security’s prospects.

Fixed Income Risks. Vickery Financial may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

Foreign Securities Risks. Vickery Financial may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security’s underlying foreign currency.

Item 9 - Disciplinary Information

We have not been the subject of any legal or disciplinary events that would be material to your evaluation of our business or the integrity of our management.

Item 10 - Other Financial Industry Activities and Affiliations

Insurance Activities

As explained under ***Item 5*** above, our advisory representatives are licensed as insurance agents with various insurance companies. Vickery Financial is not an affiliate of any insurance company. Nonetheless, these arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation your advisory representative can receive rather than based upon your needs.

Third-Party Referral Arrangements

Our advisory representatives may also recommend various third-party asset management or commodity trading firms to whom we refer clients. If you establish an advisory relationship with one of these firms, our firm or advisory representatives may share in the advisory fees you pay to these asset management firms through the receipt of an ongoing referral fee. You will be notified in advance in writing if we are in the position to receive such fees.

The above arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation we receive rather than based upon your needs. Because compensation can differ depending on the individual agreement with each third-party manager, we may have an incentive to recommend a particular third-party managers over other third-party managers with which we have a less favorable compensation arrangement or alternative advisory program. We will explain the specific costs associated with any recommended investments and third-party firms. We will also disclose the nature and amount of any additional compensation we may receive as a result of our recommendations. You have the option to purchase investment and insurance products through brokers or agents who are not affiliated with us.

Any solicitation or referral arrangements will comply with applicable laws that govern the nature of the service, fees to be paid, disclosures to clients and any necessary client consents. You are under no obligation to follow our recommendations.

Loring Ward/SA Funds

Previously we have recommended, where appropriate, that clients invest in shares of the SA Funds - Investment Trust (the "SA Funds"), a family of mutual funds advised, managed and administrated by Loring Ward. Loring Ward earns management and/or administrative fees directly from the SA Funds for its services. Because Loring

Ward earns compensation from the SA Funds, the administrative fees Loring Ward assesses on your account may be reduced for the portion of your portfolio invested in the SA Funds.

For clients who participate in Loring Ward's *Structured Investing Program*, our set advisory fee includes the administrative fees charged by Loring Ward. This means that we pay Loring Ward from our fee and keep the remaining balance. When SA Funds are used in your account, the administrative fee we pay to Loring Ward on your behalf is reduced and we retain more of the advisory fee. This represents a conflict of interest in that it provides incentive for us to choose SA Funds for your account. We do not currently recommend SA Funds to our clients, but certain legacy clients and associated persons of the firm may retain them in their accounts for tax and other reasons.

Loring Ward may sponsor educational seminars for our benefit and the benefit of our clients. These educational seminars provide us with access to information and ideas regarding practice development, client servicing, investment strategy, relationship management, and financial planning. Attendance expenses associated with such educational seminars may be paid or reimbursed, either in whole or in part, by Loring Ward.

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

Vickery Financial has adopted a Code of Ethics ("the Code"), the full text of which is available to you upon request. Vickery Financial's Code has several goals. First, the Code is designed to assist Vickery Financial in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, Vickery Financial owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires persons associated with Vickery Financial (managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits such associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for Vickery Financial's associated persons. Under the Code's Professional Standards, Vickery Financial expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, Vickery Financial associated persons are not to take inappropriate advantage of their positions in relation to Vickery Financial clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time Vickery Financial's associated persons may invest in the same securities recommended to clients. Under its Code, Vickery Financial has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

Participation or Interest in Client Transactions

As outlined above, Vickery Financial has adopted procedures to protect client interests when its associated persons invest in the same securities as those selected for or recommended to clients. In the event of any identified potential trading conflicts of interest, Vickery Financial's goal is to place client interests first.

Consistent with the foregoing, Vickery Financial maintains policies regarding participation in initial public offerings ("IPOs") and private placements to comply with applicable laws and avoid conflicts with client transactions. If a Vickery Financial associated person wishes to participate in an IPO or invest in a private placement, he or she must submit a pre-clearance request and obtain the approval of the Chief Compliance Officer.

Finally, if associated persons trade with client accounts (i.e., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person's shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with Vickery Financial's written policy.

Item 12 - Brokerage Practices

Best Execution and Benefits of Brokerage Selection

Loring Ward generally conducts trading in clients' accounts based on our instructions and executes transactions through a broker-dealer, Loring Ward Securities Inc. ("LWSI") that is affiliated and under common ownership with Loring Ward. LWSI is a securities broker-dealer that introduces all transactions on a fully-disclosed basis to one of its correspondent clearing firms: Pershing LLC ("Pershing"); Fidelity Brokerage Services, LLC ("Fidelity"); Charles Schwab & Co., Inc. ("Schwab"); or TD Ameritrade, Inc. ("TD Ameritrade"). We or you may incur additional brokerage commissions, ticket charges or other similar expenses that are collected by LWSI, or another broker-dealer and/or custodian of record.

You will designate the particular broker-dealer for custodial or transaction services on behalf of your portfolio. This choice is generally limited to brokers that have an existing relationship with Loring Ward. We are independently owned and operated and not affiliated with any Custodian. Our use of a Custodian is, however, a beneficial business arrangement for us and for the Custodian. Information regarding the benefits of this relationship is described below.

In recommending a firm as custodian and as the securities brokerage firm responsible for executing transactions for your portfolios, we consider at a minimum the Custodian's:

- existing relationship with us,
- financial strength,
- reputation,
- reporting capabilities,
- execution capabilities,
- pricing, and
- types and quality of research.

The determining factor in the selection of the Custodians to execute transactions for your accounts is not the lowest possible transaction cost, but whether the Custodians can provide what is in our view the best qualitative execution for your account.

The Custodians provide us with access to its institutional trading and custody services, which includes:

- brokerage,
- custody,
- research, and
- access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

We are not required to effect a minimum volume of transactions or maintain a minimum dollar amount of client assets to receive these services.

The Custodians do not charge separately for holding our clients' accounts, but may be compensated by you through other transaction-related fees associated with the securities transactions they execute for your accounts.

The Custodians also make available to us other products and services that benefit us but may not benefit you directly. Some of these products and services assist us in managing and administering our client accounts, such as software and other technology that:

- provide access to account data such as:
 - duplicate trade confirmations,
 - bundled duplicate account statements, and
 - access to an electronic communication network for client order entry and account information;
- facilitate trade execution, including:
 - access to a trading desk serving advisory participants exclusively and
- provide research, pricing information and other market data;
- facilitate payment of our fees from client accounts; and
- assist with back-office functions, record keeping and client reporting; and receipt of compliance publications.

The Custodians also make available to us other services intended to help us manage and further develop our business. These services may include:

- consulting,
- publications and conferences on practice management,
- information technology,
- business succession,
- regulatory compliance, and
- marketing.

The Custodians may also make available or arrange for these types of services to be provided to us by independent third parties. The Custodians may discount or waive the fees it would otherwise charge for some of the services it makes available to us. It may also pay all or a part of the fees of a third party providing these services to us. Thus, we receive economic benefits as a result of our relationship with the Custodians to the extent we do not have to produce or purchase the products and services listed above for ourselves.

Because the products or services we receive may vary depending on the custodian we recommend to be used by our clients, we may have a conflict of interest in making that recommendation. Our recommendation of specific custodians may be based in part on the economic benefit to us and not solely on the nature, cost or quality of custody and brokerage services provided to you and our other clients. We nonetheless strive to act in your best interests at all times.

We believe, however, that the overall level of services and support provided to our clients by the Custodians outweighs the benefit of possibly lower transactions cost which may be available under other brokerage arrangements.

Many of the services described above may be used to benefit all or a substantial number of our accounts, including accounts not maintained with a particular custodian. We do not attempt to allocate these benefits to specific clients.

Aggregated Trading

Client orders executed by Loring Ward may be aggregated by Loring Ward to achieve best execution. We do not specifically request that trades be aggregated.

Directed Brokerage

You may direct us in writing to use a particular broker-dealer to execute some or all of the transactions for your account. If you do so, you are responsible for negotiating the terms and arrangements for the account with that broker-dealer. We may not be able to negotiate commissions, obtain volume discounts, or best execution. In addition, under these circumstances a difference in commission charges can exist between the commissions charged to clients who direct us to use a particular broker or dealer and other clients who do not direct us to use a particular broker or dealer.

Item 13 - Review of Accounts

All client accounts are monitored on an ongoing basis with a formal review conducted at least annually or as agreed upon with you. The reviews focus on the consistency of portfolio investments with your stated objectives and risk tolerances. Reviews also consider investment restrictions requested by you, investment time horizons, liquidity needs, tax considerations and other circumstances unique to you.

On a quarterly basis, the performance of your account is reviewed to monitor consistency with market benchmarks that we deem applicable. Account reviews can also be triggered by other factors such as changes in general economic and market conditions, analyst reports, issuer news and interest rate movement. Your advisory representative is responsible for all reviews.

You will receive statements from the custodian at least quarterly. These statements identify your current investment holdings and their current market values. You will also receive written performance analysis reports prepared by us which describe the returns realized on the investments in your account.

Item 14 - Client Referrals and Other Compensation

We also receive certain economic benefits as a result of our participation in the institutional programs offered by the Custodians. Those benefits are described in detail in ***Item 12 - Brokerage Practices***. The availability of the Custodians' products and services is based solely on our participation in their programs, and not on the provision of any particular investment advice. Neither the Custodians nor any other party is paid to refer clients to Vickery Financial.

Item 15 - Custody

Your account is maintained with a qualified custodian. We do not have physical custody of your assets but we may be deemed to have custody of your account when you authorize us to deduct our advisory fees directly from your account. You will receive statements from the custodian that holds your investment account on at least a quarterly basis. We urge you to carefully review these statements and compare them to the account statements that we may provide you. You should verify that the transactions in your account are consistent with your investment goals and the objectives for your account. We also encourage you to contact your advisory representative or our Chief Compliance Officer should you have any questions or concerns regarding your account.

Item 16 - Investment Discretion

As described above under ***Item 4 - Advisory Business***, Vickery Financial manages portfolios on a non-discretionary basis. The client generally executes a Limited Power of Attorney ("LPOA"), which allows Vickery Financial to carry out trade recommendations and approved actions in the portfolio. However, in accordance with the investment advisory agreement between Vickery Financial and the client, Vickery Financial does not implement trading recommendations or other actions in the account unless and until the client has approved the recommendation or action. In addition, clients may limit the terms of the LPOA, subject to Vickery Financial's agreement with the client and the requirements of the client's custodian.

Item 17 - Voting Client Securities

We do not take any action or give any advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which your accounts may be invested. You will receive information about proxies from your account custodian. In addition, we do not take any action or give any advice with respect to any securities held in any accounts that are named in or subject to class action lawsuits. We will, however, forward to you any information received by us regarding proxies and class action legal matters involving any securities held in your accounts.

Item 18 - Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you and we have not been the subject of a bankruptcy proceeding.

Set forth below is the Summary of Material Changes for Vickery Financial Services, Inc.:

Date of Change	Description of Item
October 2015	Deanna Bloom became an Investment Adviser Representative of Vickery Financial Services, Inc. Please see <i>Exhibit A, Brochure Supplement</i> for more information on this material change.
December 2015	Clark Brown became an Investment Adviser Representative of Vickery Financial Services, Inc. Please see <i>Exhibit A, Brochure Supplement</i> for more information on this material change.

Exhibit A

**Form ADV Part 2B
Brochure Supplement**

Charles J. Vickery, ChFC, CLU
CRD# 149713

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www.vickeryfinancial.com

March 30, 2016

This brochure supplement provides information about Charles J. Vickery that supplements the Vickery Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Charles J. Vickery, President and Chief Compliance Officer, if you did not receive Vickery Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Charles J. Vickery is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Charles J. Vickery

Year of birth: 1947

Formal education:

- University of Georgia – 1970, B.B.A., Risk Management

Business background:

- Vickery Financial Services, Inc.
President, Chief Compliance Officer, Advisory Representative, Owner
(1982 – Present)
- FSC Securities Corporation
Registered Principal (1982 – 2014)

Professional Designations

The Chartered Financial Consultant® (ChFC) designation program focuses on the comprehensive financial planning process. The designation is granted by The American College.

Candidates must have three years of full-time business experience within the previous five years; complete six required and two elective college-level courses; pass an examination for each; and meet ethical standards. To retain the designation, on-going continuing education is required.

The Chartered Life Underwriter® (CLU) designation is a professional credential for persons providing advisory services related to risk management. The CLU® designation is awarded by The American College. Candidates must have three years of full-time business experience in the five years preceding the designation, and successfully complete eight college-level courses, generally requiring 400 hours of study and examinations for each course. Designees have continuing education requirements and must adhere to high ethical standards.

Disciplinary Information

Charles J. Vickery has not been the subject of any legal or disciplinary event.

Other Business Activities

In addition to his association with Vickery Financial, Mr. Vickery is also a licensed insurance agent. Mr. Vickery may also earn commissions from insurance products you purchase from him. This additional compensation presents a conflict of interest because it may create an incentive to recommend products based upon compensation, rather than on your needs. Mr. Vickery will explain the costs associated with any recommendations he makes. You have no obligation to do business with Mr. Vickery in his capacity as an insurance agent.

Additional Compensation

Mr. Vickery receives additional compensation for his activities as an insurance agent. This compensation is described under “Other Business Activities” above.

Certain Third-Party Advisory Service Programs that Mr. Vickery may offer you may provide him with the opportunity to attend training or education conferences. This compensation is limited to reimbursement for travel, meals and lodging expenses incurred for attending the training or education conference. Further, if Mr. Vickery presents the Third Party’s products or services during seminars or presentations, he may be reimbursed for advertising or marketing expenses associated with the seminar or presentation.

As outlined above, you should be aware of the incentives Mr. Vickery has to sell insurance products and in providing various advisory services. You are encouraged to ask him about any conflicts presented so that you can make an informed decision to determine whether these arrangements are in your best interest.

Supervision

Mr. Vickery is supervised by Deanne S. Rosso, Advisory Representative. Ms. Rosso can be reached at 706.353.2728.

We supervise Mr. Vickery by requiring that he adhere to our processes and procedures as described in our firm’s Code of Ethics. We will monitor the advice that Mr. Vickery gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established;

- A review of account transactions;
- Review custodial information on a quarterly basis to assess account activity;
- Perform annual oversight so that Mr. Vickery is aware of your current financial situation, objectives, and individual investment needs; and
- A review of client correspondence on an as needed basis.

**Form ADV Part 2B
Brochure Supplement**

Deanne S. Rosso, CFP®
CRD# 5021755

Vickery Financial Services, Inc.
190 Hawthorne Park
Athens, Georgia
30606

706.353.2728

www.vickeryfinancial.com

March 30, 2016

This brochure supplement provides information about Deanne S. Rosso that supplements the Vickery Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Charles J. Vickery, President and Chief Compliance Officer, if you did not receive Vickery Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Deanne S. Rosso is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Deanne S. Rosso

Year of birth: 1982

Formal education:

- University of Georgia – 2005, B.S.F.C.S.

Business background:

- Vickery Financial Services, Inc.
Advisory Representative (2005 – Present)
Owner (2014 – Present)
- FSC Securities Corporation
Registered Representative (2007 – 2014)

Professional Designations

CFP® certificant, or CERTIFIED FINANCIAL PLANNER professional and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”), is a voluntary professional designation granted by the Certified Financial Planner Board of Standards, Inc. in the US. A candidate for the designation must meet the following requirements: Bachelor’s Degree (or higher) from an accredited college university; three years of full-time personal financial planning experience; completion of a comprehensive program of study; successful passing of a 10-hour exam; and agree to be bound by the Standards of Professional Conduct, the ethical and practice standards for CFP® professionals. After certification, continued use of the designation mandates 30 hours of continuing education every two years and on-going commitment to the ethics and practice standards.

Disciplinary Information

Ms. Rosso has not been the subject of any legal or disciplinary event.

Other Business Activities

Ms. Rosso is not engaged in any other business activities outside of her activities as an advisory representative of Vickery Financial.

Additional Compensation

Certain Third-Party Advisory Service Programs that Ms. Rosso may offer you may provide her with the opportunity to attend training or education conferences. This compensation is limited to reimbursement for travel, meals and lodging expenses incurred for attending the training or education conference. Further, if Ms. Rosso presents the Third Party's products or services during seminars or presentations, she may be reimbursed for advertising or marketing expenses associated with the seminar or presentation.

You should be aware of the incentives Ms. Rosso has in providing various advisory services. You are encouraged to ask her about any conflicts presented so that you can make an informed decision to determine whether these arrangements are in your best interest.

Supervision

Ms. Rosso is supervised by Charles J. Vickery, President and Chief Compliance Officer. Mr. Vickery can be reached at 706.353.2728.

We supervise Ms. Rosso by requiring that she adhere to our processes and procedures as described in our firm's Code of Ethics. We will monitor the advice that Ms. Rosso gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established;
- A review of account transactions,
- Review custodial information on a quarterly basis to assess account activity;
- Perform annual oversight so that Ms. Rosso is aware of your current financial situation, objectives, and individual investment needs; and
- A review of client correspondence on an as needed basis.

**Form ADV Part 2B
Brochure Supplement**

Clarke C. Holt
CRD# 3206937

Vickery Financial Services, Inc.
190 Hawthorne Park
Athens, Georgia
30606

706.353.2728

www.vickeryfinancial.com

March 30, 2016

This brochure supplement provides information about Clarke C. Holt that supplements the Vickery Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Charles J. Vickery, President and Chief Compliance Officer, if you did not receive Vickery Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Clarke C. Holt is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Clarke C. Holt

Year of birth: 1973

Formal education:

- Georgia Southwestern State University – 1996, B.B.A.,

Business background:

- Vickery Financial Services, Inc.
Advisory Representative (2003 – Present)
- FSC Securities Corporation
Registered Representative (2003 – 2014)
- Citigroup/Smith Barney
Registered Representative (1999 – 2003)

Disciplinary Information

Mr. Holt has not been the subject of any legal or disciplinary event.

Other Business Activities

Mr. Holt has no other business activities outside of his association with Vickery Financial Services.

Additional Compensation

Certain Third-Party Advisory Service Programs that Mr. Holt may offer you may provide him with the opportunity to attend training or education conferences. This compensation is limited to reimbursement for travel, meals and lodging expenses incurred for attending the training or education conference. Further, if Mr. Holt presents the Third Party's products or services during seminars or presentations, he may be reimbursed for advertising or marketing expenses associated with the seminar or presentation.

As outlined above, you should be aware of the incentives Mr. Holt has in recommending various Third Party Advisory Service Programs. You are encouraged to ask him about any conflicts presented so that you can make an informed decision to determine whether these arrangements are in your best interest.

Supervision

Mr. Holt is supervised by Charles J. Vickery, President and Chief Compliance Officer. Mr. Vickery can be reached at 706.353.2728.

We supervise Mr. Holt by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics. We will monitor the advice that Mr. Holt gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established
- A review of account transactions;
- Review custodial information on a quarterly basis to assess account activity;
- Perform annual oversight so that Mr. Holt is aware of your current financial situation, objectives, and individual investment needs; and
- A review of client correspondence on an as needed basis.

**Form ADV Part 2B
Brochure Supplement**

Dwight D. Langley
CRD# 2840337

Vickery Financial Services, Inc.
190 Hawthorne Park
Athens, Georgia
30606

706.353.2728

www.vickeryfinancial.com

March 30, 2016

This brochure supplement provides information about Dwight D. Langley that supplements the Vickery Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Charles J. Vickery, President and Chief Compliance Officer, if you did not receive Vickery Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Dwight D. Langley is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Dwight D. Langley

Year of birth: 1975

Formal education:

- University of Georgia – 1998 B.S.F.C.S.

Business background:

- Vickery Financial Services, Inc.
Advisory Representative (2009 to Present)
- FSC Securities Corporation
Registered Representative (2009 to 2014)
- Morgan Keegan & Company, Inc.
Registered Representative (2007 to 2009)

Disciplinary Information

Mr. Langley has not been the subject of any legal or disciplinary event.

Other Business Activities

In addition to his association with Vickery Financial, Mr. Langley is also a licensed insurance agent. Mr. Langley may earn commissions from insurance products you purchase from him. This additional compensation presents a conflict of interest because it may create an incentive to recommend products based upon compensation, rather than on your needs. Mr. Langley will explain the costs associated with any recommendations he makes. You have no obligation to do business with Mr. Langley in his capacity as an insurance agent.

Additional Compensation

Mr. Langley receives additional compensation for his activities as an insurance agent. This compensation is described under “Other Business Activities” above.

Certain Third-Party Advisory Service Programs that Mr. Langley may offer you may provide him with the opportunity to attend training or education conferences. This

compensation is limited to reimbursement for travel, meals and lodging expenses incurred for attending the training or education conference. Further, if Mr. Langley presents the Third Party's products or services during seminars or presentations, he may be reimbursed for advertising or marketing expenses associated with the seminar or presentation.

As outlined above, you should be aware of the incentives Mr. Langley has to sell insurance products and in providing various advisory services. You are encouraged to ask him about any conflicts presented so that you can make an informed decision to determine whether these arrangements are in your best interest.

Supervision

Mr. Langley is supervised by Charles J. Vickery, President and Chief Compliance Officer. Mr. Vickery can be reached at 706.353.2728.

We supervise Mr. Langley by requiring that he adhere to our processes and procedures as described in our firm's *Code of Ethics*. We will monitor the advice that Mr. Langley gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established;
- A review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight so that Mr. Langley is aware of your current financial situation, objectives, and individual investment needs; and
- A review of client correspondence on an as needed basis.

**Form ADV Part 2B
Brochure Supplement**

Robert M. Fezekas, CFA
CRD# 2972284

Vickery Financial Services, Inc.
190 Hawthorne Park
Athens, Georgia
30606

706.353.2728

www.vickeryfinancial.com

March 30, 2016

This brochure supplement provides information about Robert Fezekas that supplements the Vickery Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Charles J. Vickery, President and Chief Compliance Officer, if you did not receive Vickery Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

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

Educational Background and Business Experience

Robert M. Fezekas

Year of birth: 1970

Formal education:

- University of Chicago Booth School of Business – 1997, M.B.A., Concentrations in Analytic Finance, Statistics, and Economics
- University of Iowa – 1992, B.B.A. in Finance

Business background:

- Vickery Financial Services, Inc.
Wealth Advisor (01/2015 to Present)
- Robert M. Fezekas, CFA
Independent Financial Consultant (1/2007 to Present)
- Dimensional Fund Advisors, Inc.
Vice President and Portfolio Manager (08/1997 to 01/2005)

Professional Designation:

CFA - The Chartered Financial Analyst designation, or CFA charter, has become a respected and recognized investment credential.

To earn a CFA charter, you must have four years of qualified investment work experience, become a member of CFA Institute, pledge to adhere to Code of Ethics and Standards of Professional Conduct on an annual basis, apply for membership to a local CFA member society, and complete the CFA Program.

The CFA Program is organized into three levels, each culminating in a six-hour exam. Completing the program takes most candidates between two and five years (there is no limit to the number of times you can take each exam), but you can take as long as you need to complete the program.

Disciplinary Information

Mr. Fezekas has not been the subject of any legal or disciplinary event.

Other Business Activities

Mr. Fezekas has no other business activities outside of his association with Vickery Financial Services.

Additional Compensation

Certain Third-Party Advisory Service Programs that Mr. Fezekas may recommend to you may provide him with the opportunity to attend training or education conferences. This compensation is limited to reimbursement for travel, meals and lodging expenses incurred for attending the training or education conference. Further, if Mr. Fezekas presents the Third Party's products or services during seminars or presentations, he may be reimbursed for advertising or marketing expenses associated with the seminar or presentation.

Supervision

Mr. Fezekas is supervised by Charles J. Vickery, President and Chief Compliance Officer. Mr. Vickery can be reached at 706.353.2728.

We supervise Mr. Fezekas by requiring that he adhere to our processes and procedures as described in our firm's *Code of Ethics*. We will monitor the advice that Mr. Fezekas gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established;
- A review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight so that Mr. Fezekas is aware of your current financial situation, objectives, and individual investment needs; and
- A review of client correspondence on an as needed basis.

**Form ADV Part 2B
Brochure Supplement**

David M. Jenkins CFA
CRD# 6456564

Vickery Financial Services, Inc.
190 Hawthorne Park
Athens, Georgia
30606

706.353.2728

www.vickeryfinancial.com

March 30, 2016

This brochure supplement provides information about David Jenkins that supplements the Vickery Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Charles J. Vickery, President and Chief Compliance Officer, if you did not receive Vickery Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

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

Educational Background and Business Experience

David M. Jenkins

Year of birth: 1990

Formal education:

- Terry College of Business at the University of Georgia, B.B.A. in Economics – (01/2009 – 12/2014)

Business

Background:

- Vickery Financial Services, Inc.,
Wealth Advisor (05/2015 – Present)
Servicing Advisor (01/2015 to 05/2015)
- David Jenkins, Audio/Visual Contractor (09/2014 to Present)
- University of Georgia, Student (01/2009 – 12/2014)

Disciplinary Information

Mr. Jenkins has not been the subject of any legal or disciplinary event.

Other Business Activities

Mr. Jenkins has no other investment-related business activities outside of his association with Vickery Financial Services.

Additional Compensation

Certain Third-Party Advisory Service Programs that Mr. Jenkins may recommend to you may provide him with the opportunity to attend training or education conferences. This compensation is limited to reimbursement for travel, meals and lodging expenses incurred for attending the training or education conference. Further, if Mr. Jenkins presents the Third Party's products or services during seminars or presentations, he may be reimbursed for advertising or marketing expenses associated with the seminar or presentation.

Supervision

Mr. Jenkins is supervised by Charles J. Vickery, President and Chief Compliance Officer. Mr. Vickery can be reached at 706.353.2728.

We supervise Mr. Jenkins by requiring that he adhere to our processes and procedures as described in our firm's *Code of Ethics*. We will monitor the advice

that Mr. Jenkins gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established;
- A review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight so that Mr. Jenkins is aware of your current financial situation, objectives, and individual investment needs; and
- A review of client correspondence on an as needed basis.

**Form ADV Part 2B
Brochure Supplement**

Deanna Louise Bloom
CRD# 4708174

Vickery Financial Services, Inc.
190 Hawthorne Park
Athens, Georgia
30606

706.353.2728

www.vickeryfinancial.com

March 30, 2016

This brochure supplement provides information about Deanna L. Bloom that supplements the Vickery Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Charles J. Vickery, President and Chief Compliance Officer, if you did not receive Vickery Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Deanna L. Bloom is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Deanna L. Bloom

Year of birth: 1973

Formal education:

- Rock Valley College; General Education classes (1990-1992)

Business

Background:

- Vickery Financial Services, Inc.,
Client Services Advisor (10/2015 – Present)
- MainStreet Financial Group,
Financial Advisor and Partner (7/2009 - 5/2015)
Financial Advisor & Executive Assistant to CEO (8/2004 - 7/2009)
- Summit Brokerage Services, Inc.,
Registered Assistant (1/2012 - 6/2015)
- J.W. Cole Financial, Inc.,
Registered Assistant (3/2011 – 1/2012)
- Summit Brokerage Services, Inc.,
Registered Representative (5/2006 - 3/2011)
- Intersecurities, Inc.
Registered Representative (6/2005 – 5/2006)

Disciplinary Information

Ms. Bloom has not been the subject of any legal or disciplinary event.

Other Business Activities

Ms. Bloom has no other investment-related business activities outside of her association with Vickery Financial Services.

Additional Compensation

Certain Third-Party Advisory Service Programs that Ms. Bloom may offer you may provide her with the opportunity to attend training or education conferences. This compensation is limited to reimbursement for travel, meals and lodging expenses incurred for attending the training or education conference.

Further, if Ms. Bloom presents the Third Party's products or services during seminars or presentations, she may be reimbursed for advertising or marketing expenses associated with the seminar or presentation.

Supervision

Ms. Bloom is supervised by Charles J. Vickery, President and Chief Compliance Officer. Mr. Vickery can be reached at 706.353.2728.

We supervise Ms. Bloom by requiring that she adhere to our processes and procedures as described in our firm's *Code of Ethics*. We will monitor the advice that Ms. Bloom gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established;
- A review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight so that Ms. Bloom is aware of your current financial situation, objectives, and individual investment needs; and
- A review of client correspondence on an as needed basis.

**Form ADV Part 2B
Brochure Supplement**

Clark D. Brown, CWS®
CRD# 1536078

Vickery Financial Services, Inc.
190 Hawthorne Park
Athens, Georgia
30606

706.353.2728

www.vickeryfinancial.com

March 30, 2016

This brochure supplement provides information about Clark D. Brown that supplements the Vickery Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Charles J. Vickery, President and Chief Compliance Officer, if you did not receive Vickery Financial Services, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Clark D. Brown is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Clark D. Brown

Year of birth: 1962

Formal education:

- University of Southern California - 2015 BS in Business Administration

Business

Background:

- Vickery Financial Services, Inc.,
Wealth Advisor (10/2015 – Present)
- Cannon Financial Institute,
Consultant-Wealth Management Industry (10/1998 - Present)
- Bank of America, Private Bank
Regional Vice President (9/1996 – 10/1998)
- City National Bank. Investment Management & Trust Service
Vice President, Product Manager (4/1992 – 9/1996)
- Security Pacific Bank, Capital Markets Group
Vice President, Senior Investment Officer (3/1986 – 4/1992)

Professional Designations

Certified Wealth Strategist® or CWS® designation is administered by Cannon Financial Institute. The CWS® program is a comprehensive study of key wealth management issues impacting affluent and high net worth clients. The CWS® program utilizes a blended learning approach that includes instructor-led training, 13 Wealth Management Issues study guides, on-line mastery exams, conversation skill builders and eLessons. The learning experience culminates with a Capstone Project: a written document demonstrating a sustainable framework which applies the new knowledge and skills to the practitioner's business. The program provides the knowledge, the practice management formula, and the critical client interaction skills to create and build a dynamic Wealth Advisory practice that works effectively with complex client issues. The CWS® Board of Standards awards credentials to individuals who successfully complete initial and ongoing certification requirements.

Disciplinary Information

Mr. Brown has not been the subject of any legal or disciplinary event.

Other Business Activities

Mr. Brown is the Executive Vice President and a member of the Board of Directors for Cannon Financial Institute, a consulting and training services firm for the financial services industry. As such, Mr. Brown may receive separate, yet customary compensation, for his consulting services.

Additional Compensation

Certain Third-Party Advisory Service Programs that Mr. Brown may offer you may provide him with the opportunity to attend training or education conferences. This compensation is limited to reimbursement for travel, meals and lodging expenses incurred for attending the training or education conference. Further, if Mr. Brown presents the Third Party's products or services during seminars or presentations, he may be reimbursed for advertising or marketing expenses associated with the seminar or presentation.

Supervision

Mr. Brown is supervised by Charles J. Vickery, President and Chief Compliance Officer. Mr. Vickery can be reached at 706.353.2728.

We supervise Mr. Brown by requiring that he adhere to our processes and procedures as described in our firm's *Code of Ethics*. We will monitor the advice that Mr. Brown gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established;
- A review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight so that Mr. Brown is aware of your current financial situation, objectives, and individual investment needs; and
- A review of client correspondence on an as needed basis.