

Victoria Lynn Woods  
ChappelWood Financial Services Corp.

CRD # 134318

Financial District of Oklahoma

1725 E 15<sup>th</sup> Street

Edmond, OK 73013

(405) 348-0909

[www.ChappelWood.com](http://www.ChappelWood.com)

Date of Brochure: January 22, 2016

**This Brochure Supplement provides information about Victoria Lynn Woods that supplements the ChappelWood Financial Services (CFS) Brochure. You should have received a copy of that Brochure. Please contact CFS if you did not receive CFS's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Victoria Lynn Woods is available on the SEC's website at [www.Advisorinfo.sec.gov](http://www.Advisorinfo.sec.gov).**

**Item 2 – Educational Background and Business Experience**

Victoria Lynn Woods  
DOB: 09/10/1955

ChappelWood Financial Services Corp. currently a Oklahoma Independent Registered Investment Advisory Firm, position CEO/CCO/Chief Investment Advisor 1988-current

ChappelWood Investment Corp., Real Estate Development, position Founder and CEO 1990-current

Founder of the 84 Acre Financial District of Oklahoma, located in Edmond, OK

Insurance Agent Licensed 1988-Current Oklahoma Resident, Non Resident in Texas and California

Investment Co Product/Variable Contract Representative Series 6 - 3/26/1997

Uniform Securities Agent Sate Law Examination Series 63 – 4/10/1997

Uniform Securities Agent State Law Examination Series 65 – 12/31/2004

AssetMark Silver Premier Consultant 2010- advisors with a minimum of multi million in net Assets Under Management, attendance in multiple “Mastery Program”, by invitation only to exclusive regional meetings, held in cities across the country, feature access to portfolio strategists and Investment Policy members. Participate in break-out sessions on important topics affecting the financial services industry, and interact with your peers to discuss new ways to improve our practice.

AssetMark Gold Premier Consultant 2015-Minimum of 25Million in Assets Under Management

Appointed by Governor Fallin-2013 State Commissioner for the State of Oklahoma Status of Women, currently Finance Chair

Member Financial Planners Association

Host of the weekly Radio Show heard on NewsRadio 1000 KTOK; *It's All About the \$Money, Honey!*

Formal Post High School Education- Tarrant County College

Damon Matthew King

DOB 11/14/1976

ChappelWood Financial Services Corp. an Oklahoma Registered Investment Advisory Firm, position Investment Advisor, 2015-current

Insurance Agent Licensed 2014-Current Oklahoma Resident

CERTIFIED FINANCIAL PLANNER™ passed examination – 7/18/2014

Uniform Securities Act Examination Series 66 – 11/4/2014

Investment Advisor Representative Examination Series 65 – 9/29/2015

Twelve years as a professional fundraiser specializing in charitable gift planning for high net worth families. Certified Fund Raising Executive. Candidate for CERTIFIED FINANCIAL PLANNER™ certification. Member of Financial Planning Association. Formal Post High School Education – University of Central Oklahoma

## **Item 2 – Material Changes**

ChappelWood Financial Services Form ADV Part 2 and Part 2B combined date January 2016 contains material changes from the prior version dated December 5, 2013. The current version contains the following changes from the prior version:

- Addition of Damon King, Investment Advisor to staff
- Expansion of weekly radio show to 660 AM KSKY and 620 AM KEXB in Dallas/Fort Worth

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting CFS at (405) 348-0909 or [office@ChappelWood.com](mailto:office@ChappelWood.com). Our Brochure is also available on our web site [www.ChappelWood.com](http://www.ChappelWood.com), also free of charge.

Additional information about CFS is also available via the SEC's web site [www.Advisorinfo.sec.gov](http://www.Advisorinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with CFS who are registered, or are required to be registered, as Investment Advisor Representative of CFS.

### **Item 3 – Disciplinary Information**

Registered Investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing Investment advice. No information is applicable to this Item.

### **Item 4 – Other Business Activities**

ChappelWood Investment Corp., a real estate development and holding company. Ms. Woods devotes less than 2% of her professional time to her capacities at ChappelWood Investment Corp.

Radio Show Hosts - "It's All About the \$Money, Honey!" on NewsRadio 1000 KTOK Saturdays at 4:00pm and Sundays at 6:00am in Oklahoma City, 660 AM KSKY Saturdays at 10 am in Dallas, and 620 AM KEXB at 8 am in Dallas. Ms. Woods and Mr. King devote less than 10% of their time as Financial Radio Show Hosts.

Ms. Woods - Oklahoma Commission on the Status of Women Woods, appointed by Governor Fallin in 2013. Ms. Woods devotes 2 hours per month on her State position.

Mr. King – Oklahoma Center for Nonprofits Board member. Elected in 2010. Mr. King devotes 2 hours every other month to this position.

### **Item 5 – Additional Compensation**

Registered Investment advisors are required to describe the arrangement if someone who is not a *client* provides an economic benefit to the *supervised person* for providing advisory services. No information is applicable to this item.

### **Item 6 – Supervision**

Registered Investment Advisors are required to explain how they *supervise* the *supervised person*, including how they monitor the advice the *supervised person* provides to *clients*. No information is applicable to this Item.

## **Item 7 – Requirements for State-Registered Advisors**

Registered Investment Advisors are required to disclose all material facts regarding any arbitration claims they have been found liable in and any civil, *self-regulatory organization*, or administrative *proceedings* they have been found liable in that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

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#### **Item 4 – Advisory Business**

ChappelWood Financial Services is an Oklahoma Registered Investment Advisory firm offering personalized Investment Advisory services to High Net Worth individuals, trusts, estates, charitable organizations, corporations, and other business entities. The Advisor's services and fee arrangements are described in the following pages.

CFS is a corporation formed under the laws of the State of Oklahoma. This narrative provides Clients with information regarding CFS and the qualifications, business practices, and nature of advisory services that should be considered before becoming an advisory Client of CFS. Individuals associated with Advisor will provide its Investment Advisory services. Such individuals are known as Investment Advisor Representatives (IARs).

#### **GENERAL INFORMATION ON ADVISORY SERVICES AND FEES**

**Seminars, Workshops and Receptions:** CFS provides for clients and prospective clients these events in order to learn more about our unique and proprietary business processes, Investment Philosophy and Financial solutions offered at CFS.

#### **Financial Planning Services:**

The fees charged are calculated as described below, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds, or any portion of the funds of an advisory Client (15 U.S.C. §80b-5(a)(1)).

CFS does not represent, warrant, or imply that the services or methods of analysis employed by the Advisor can or will predict future results, successfully identify market tops or bottoms, or insulate Clients from losses due to market corrections or declines.

Advice offered by CFS may involve investment in mutual funds. Clients are hereby advised that all fees paid to CFS for Investment Advisory services are separate and distinct from the fees and expenses charged by mutual funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. Further, there may be transaction charges involved with purchasing or selling of securities. CFS does not share in any portion of the brokerage fees/transaction charges imposed by the custodian holding the Client funds or securities. The Client should review all fees charged by mutual funds, CFS, and others to fully understand the total amount of fees to be paid by the Client. CFS offers an asset allocation system known as the AssetMark Platform. For more information regarding the platform, refer to Appendix 1, AssetMark Platform Disclosure Brochure, item 4.

The minimum investment required in the AssetMark Platform depends upon the Investment Solution chosen for a client's account and is \$25,000-\$50,000 for

Mutual Fund and Variable Annuity accounts and \$100,000 for ETF Accounts, \$250,000 for Distribution Strategies and from \$50,000 to \$1,000,000 for Privately Managed and Unified Managed Accounts, depending on the investment strategy selected for the account, as described in more detail in the AssetMark Platform Disclosure Brochure, Appendix 1. Accounts below the stated minimums may be accepted on an individual basis at the discretion of the Platform sponsor.

## ASSETS UNDER MANAGEMENT

As of 12/31/15 CFS had \$26,057,744.80 in Assets Under Management. This amount does not reflect Insurance Assets Under Management.

### Item 5- Fees and Compensation

Accounts on the AssetMark Platform are assessed a total Account Fee. This Account Fee includes the Financial Advisor’s fee plus the fees for utilizing the AssetMark Platform (together the “Advisory Fee”). Additionally, the Account Fee may also include fees payable to any third-party Discretionary Manager under the IMA, CMA or UMA investment solutions. Fees and compensation for using the AssetMark Platform, including Discretionary Manager fee schedules, are provided in the AssetMark Platform Disclosure Brochure, Appendix 1, Item 4.

After the AssetMark Platform Fee is deducted from the Advisory Fee, the resulting net fees are payable to the Financial Advisor. Asset-based fees are non-negotiable.

## ASSET-BASED FEES

Level of Assets	Advisor Fee	Program Fee	Total Client Fee
First \$250,000.00	1.95%	0.00%	1.95%
Next \$250,000.00	1.80%	0.00%	1.80%
Next \$500,000.00	1.60%	0.00%	1.60%
Next \$1,000,000.00	1.30%	0.00%	1.30%
Over \$2,000,000.00	1.00%	0.00%	1.00%

## CUSTODY FEES

### Pershing Advisor Solutions

Level Of Assets	Fee
Flat Annual Fee	\$150.00

## CUSTODY FEES

### AssetMark Trust Company

Level Of Assets	Fee
First \$250,000	0.25%
Next \$750,000	0.10%
Next \$1mm	0.08%
Next \$2mm	0.05%

Client fees are payable quarterly, in advance, based on assets under management. Clients may terminate AssetMark accounts at any time and receive a full pro-rata refund of any unearned fees.

### FINANCIAL PLANNING SERVICES

- \_\_\_a) **Comprehensive Financial Planning:** Advisor will collect the pertinent data, conduct personal interviews with the Client, and present a comprehensive written financial plan to the Client.
- \_\_\_b) **Specific Financial Planning:** Advisor will collect the pertinent data, conduct personal interviews with the Client and present selected report to the Client.
- \_\_\_c) **Hourly Financial Consultation:** Advisor will provide financial consulting services on an hourly basis.

#### 1.B. Fees:

Financial planning services are offered on a fixed fee basis, which starts at \$3,000.00. The final fee shall be directly dependent upon the facts and circumstances of the client's financial situation and the complexity of the financial plan or service requested. An estimate of total cost will be determined at the start of the advisory relationship. If the client chooses to proceed, 50% of the estimated fee is due upon signing of the Agreement. Advisor's financial planning fees are negotiable and arrangements with any client may differ from those described above.

In consideration of the services rendered by Advisor, Client shall pay to Advisor the following fees:

- \_\_\_a) **Comprehensive Financial Planning:** The fee for providing comprehensive financial planning is based on the time required to prepare the financial plan. The fee for this service is estimated to be \$\_\_\_\_\_.
- \_\_\_b) **Specific Financial Planning:** The fee for providing specific financial planning is based on the time required to prepare the analysis/modular plan. The fee for this service is estimated to be \$\_\_\_\_\_.
- \_\_\_c) **Hourly Financial Consultation:** The fee for an hourly consultation is based on the time required to review the Client's situation. The Advisor's rate is \$500.00 per hour.

The fees charged by Advisor are solely for the preparation of the comprehensive financial plan, specific financial plan, or financial consultation, and do not include any commissions that might be generated upon implementation of any securities or insurance recommendations.

## **2. Responsibilities of the Client**

Client agrees to provide, on a timely basis, information regarding income and expenses, Investments, income tax situations, estate plans, and other pertinent matters as requested by Advisor from time to time. Client also agrees to discuss needs and goals and projected future needs candidly with Advisor and to keep Advisor informed, in writing, of changes in Client's situation, needs, and goals. Client acknowledges that Advisor cannot adequately perform its services on the Client's behalf unless Client performs such responsibilities on his/her part and that Advisor's analysis and recommendations are based on the information provided by Client. Client agrees to permit Advisor to consult with and obtain information about Client from Client's accountant, attorney, and other advisors. Advisor shall not be required to verify any information obtained from Client, Client's attorney, accountant or other advisors and is expressly authorized to rely on the information received. Client is free at all times to accept or reject any recommendation from Advisor and Client acknowledges that (s)he has the sole authority with regard to the implementation, acceptance, or rejection of any counseling or advice from Advisor.

The Advisor, through its Advisory Representatives, will typically provide a variety of financial planning services, principally advisory in nature, to individuals or families regarding the management of their financial resources, based upon an analysis of Client's needs.

Generally, such financial planning services will involve preparing a financial program for a Client based on the Client's financial circumstances and objectives. This information normally would cover present and anticipated assets and liabilities, including insurance, savings, Investments, and anticipated retirement or other employee benefits.

The program developed for the Clients will usually include general recommendations for a course of activity or specific actions to be taken by the Clients. For example, recommendations may be made that the Clients obtain insurance or revise existing coverage, establish an individual retirement account, increase or decrease funds held in savings accounts or invest funds in securities. The Advisory Representatives on behalf of the Advisor may develop tax or estate plans for Clients or refer Clients to an accountant or attorney.

The Advisory Representatives on behalf of their Advisor may also create a cash flow analysis or work with and advise the Clients as to the rearrangement of cash flow in order to fund certain long-term objectives such as buying a house, planning for college, retirement, etc.

The Advisor utilizes the following financial planning fee schedules, subject to negotiation, depending on the nature, complexity and time involved in providing the client with the requested services.

*Fixed Fees:* The Advisor will charge a fixed fee that ranges between \$3,000.00 to \$15,000.00, for broad based planning services. The final fee is determined based on the nature of services, complexity of the client's financial situation and the time involved in providing the client with the requested services.

*Hourly Fees:* The Advisor charges an hourly fee of \$500.00 for clients who request specific services (such as a modular plan or hourly consulting services) and do not desire a broad based written financial plan.

An estimate of the total time/cost will be determined at the start of the advisory relationship.

The Advisor will request that a client pay a retainer fee of up to 50% of the total fee with the remainder payable upon presentation of the written plan. The Agreement will terminate upon presentation of the written plan. Upon entering an advisory agreement, the Client has 5 business days to cancel the contract without penalty. After that, if the Client terminates the agreement and the Client has paid anything in advance, they will receive pro rata refund. Under no circumstance will the Advisor require prepayment of a fee more than six months in advance and in excess of \$500.

## **Item 6 – Performance-Based Fees and Side-By-Side Management**

CFS does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

## **Item 7 – Types of Clients**

CFS provides portfolio management services to individuals, trusts, charities, business owners and high net worth individuals.

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

Investing in securities involves risk of loss that clients should be prepared to bear.

In advising retail clients of CFS investing in AssetMark Platform, CFS uses model portfolios of mutual funds, Exchange Traded Funds (ETF's) and Variable Annuity sub-accounts provided by a number of institutional investment strategists and based on the information, research, asset allocation methodology and investment strategies of these institutional strategists.

CFS also introduces clients to, and advises on the selection of, independent investment managers who provide discretionary management of individual portfolios using a variety of different securities analysis methods, sources of information and investment strategies. Clients will receive separate disclosure from such investment managers regarding any such investment manager's advisory services.

With respect to clients investing in the AssetMark Platform, CFS introduces clients to, and advises on the selection of, independent investment managers who provide discretionary management of individual portfolios including a wide variety of different securities types. Clients will receive a separate disclosure from such investment managers regarding any such investment manager's advisory services.

## **Item 9 – Disciplinary Information**

Registered Investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CFS or the integrity of Victoria Wood's or Damon King's management. CFS has no legal or disciplinary events applicable to this Item (below is cut from the regulatory website, for your convenience).

CRIMINAL DISCLOSURE REPORTING PAGE (ADV)
No Information Filed
REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)
No Information Filed
CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)
No Information Filed
BOND DRPs
No Information Filed
JUDGEMENT/LEIN DRPs
No Information Filed
ARBITRATION DRPs
No Information Filed

## Item 10 – Other Financial Industry Activities and Affiliations

### OTHER BUSINESS ACTIVITIES

IAR's of CFS may be licensed as insurance agents with various insurance companies, and in such capacity, may recommend, on a fully disclosed basis, the purchase of insurance related products. Victoria Woods, President of CFS currently devotes 98% of her time to CFS. Victoria Lynn Woods, President and sole owner of CFS, is also the President of ChappelWood Investment Corporation, a real estate holding company. Ms. Woods devotes less than 2% of her professional time to her capacities at ChappelWood Investment Corporation. Damon King, Investment Advisor, devotes 100% of his time to CFS.

### ADDITIONAL COMPENSATION

As described in Item 1 above, Advisor is party to written agreements with certain Third Party Advisory Services to have its Advisory Representatives provide personal advisory services to their Clients. Such personal advisory services include: qualifying their Clients for a particular Third Party Advisory Service as well as determining Client's goals and objectives (determining risk tolerance and investment styles.) Advisor and its Advisory Representatives receive compensation pursuant to these agreements for introducing Clients to the Third Party Advisory Service and for providing the aforementioned personal advisory

services. This compensation is equal to a percentage of the Investment Advisory fee charged by the Third Party Advisory Service and because such compensation may differ depending on the individual agreement with each Third Party Advisory Service, the Advisory Representatives may have an incentive to recommend a particular Third Party Advisory Service over other Third Party Advisory Services with which Advisor has no such compensation arrangement; or alternative advisory programs including those offered through Independent Advisors.

Additional compensation may be received from Building Management Fees, and Insurance Sales.

## **Item 11 – Code of Ethics and Personal Trading; Participation in Client Transactions**

### **CODE OF ETHICS**

The Advisor or its Advisory Representatives may buy or sell securities identical to those recommended to customers for their personal accounts. In addition, any related person(s) may have an interest or position in a certain security (ies) which may also be recommended to the Clients. It is the expressed policy of the Advisor that its Advisory Representatives may not purchase or sell any individual stock or bond prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such Advisory Representatives benefiting from transactions placed on behalf of advisory accounts. As these situations represent a conflict of interest, the Advisor has established the following restrictions in order to ensure its fiduciary responsibilities.

- 1) A Director, officer or Advisory Representatives shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her affiliation with the Advisor, unless the information is also available to the investing public on reasonable inquiry. No person shall prefer his or her own interest to that of the advisory Clients.
- 2) All Clients are fully informed that certain individuals may receive separate compensation when effecting transactions during the implementation process.
- 3) The Advisor emphasizes the unrestricted right of the Clients to decline to implement any advice rendered, except in situations where a Third Party Advisory Service is granted discretionary authority in the Client's account.
- 4) The Advisor requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered Investment Advisory practices.

5) Any individual not in observance of the above may be subject to termination.

#### Footnotes

(1) This investment policy has been established recognizing that some securities being considered for purchase and sale on behalf of the Advisor's Client's trade in sufficiently broad markets to permit transactions by Clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions, will be maintained with the Advisor's records in the manner set forth above.

(2) Open-end mutual funds and/or the investment sub-accounts which may comprise a variable insurance product are purchased or redeemed at a fixed net asset value price per share specific to the date of purchase or redemption. As such, transactions in mutual funds and/or variable insurance products by Advisory Representatives are not likely to have an impact on the prices of the fund shares in which Clients invest, and are therefore not prohibited by the Advisor's investment policies and procedures. In accordance with Section 20A of the Investment Advisors Act of 1940, the Advisor also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the Advisor or any person associated with the Advisor.

#### PRIVACY POLICIES

Protecting Client privacy is very important to CFS. The Advisor views protecting its customers' private information as a top priority and, pursuant to the requirements of the federal Gramm-Leach-Bliley Act, the Advisor has instituted policies and procedures to ensure that customer information is kept private and secure.

CFS does not disclose any nonpublic personal information about its customers or former customers to any nonaffiliated third parties, except as permitted by law. In the course of servicing a Client's account, CFS may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers.

CFS restricts internal access to nonpublic personal information about the Client to those associated persons of the Advisor who needs access to that information in order to provide services to the Client. As emphasized above, it has always been and will always be the Advisor's policy never to sell information about current or former customers or their accounts to anyone. It is also the Advisor's policy not to share information unless required to process a transaction, at the request of a customer, or as required by law.

CFS has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at CFS must acknowledge the terms of the Code of Ethics annually, or as amended.

CFS anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which CFS has management authority to effect, and will recommend to Investment Advisory clients or prospective clients, the purchase or sale of securities in which CFS, its affiliates and/or clients, directly or indirectly, have a position of interest. CFS's employees and persons associated with CFS are required to follow CFS's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of CFS and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for CFS's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of CFS will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of CFS's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between CFS and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with CFS's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. CFS will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

CFS's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting CFS.

It is CFS's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. CFS will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an Advisor, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an Investment Advisor in relation to a transaction in which the Investment Advisor, or any person controlled by or under common control with the Investment Advisor, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an Advisor is dually registered as a broker-dealer or has an affiliated broker-dealer.

## **Item 12 – Brokerage Practices**

### **INVESTMENTOR BROKERAGE DISCRETION**

CFS assists the client in selecting the risk/return objective and Portfolio Strategists that best suit the client's objectives. The client then specifically directs the account to be invested in accordance with the chosen asset allocation. When the client selects the asset allocation, the client further directs that the account be automatically adjusted to reflect any adjustment in the asset allocation by the selected Portfolio Strategist. This client authorization results in the purchase and sale of certain mutual funds or ETFs (or transfers between variable annuity sub-accounts) without further authorization by the client or any other party at such time as the Portfolio Strategist changes the composition of the selected model asset allocation.

The client receives confirmation of all transactions in the account and is free to terminate participation in the Platform and retain or dispose of any assets in the account at any time. CFS has no authority to cause any purchase or sale of securities in any client account, or change the selected model asset allocation or to direct the account to be invested in any manner other than as previously authorized by the client.

If a client selects an IMA, UMA or CMA investment solution, the third-party Discretionary Managers are granted the authority to manage the accounts on a discretionary basis, including the authority to buy, sell, select, remove and select securities and other Investments for the account, and to select broker-dealers or others through which transactions will be effected.

## SUGGESTION OF BROKER

Neither CFS, its associated persons, nor unaffiliated Investment Advisory with which CFS may have agreements, directly suggest brokers to Clients, unless done in conjunction with investment management programs. The Client is always free to utilize their broker of choice in implementing the advice or financial plan.

### **Item 13 – Review of Accounts**

Victoria Woods, President of CFS, and Damon King, Investment Advisor, will monitor Client accounts on a regular basis to ensure the advisory services provided to the Client are consistent with the Client's investment needs and objectives. CFS will offer Clients a formal account review on an annual, semiannual or quarterly basis or more often upon request from the Client. Triggering factors that may stimulate a review include, but are not limited to, significant market corrections, large deposits or withdrawals from an account and the Client's request for an additional review. Clients will receive statements directly from the account custodian at least quarterly.

Investors participating in the AssetMark Platform will receive periodic custodial account statements (not less frequently than quarterly) from their account Custodian.

Additionally, CFS issues periodic written reports to its Investment Advisory clients. These written reports generally contain a list of assets, investment results, and statistical data related to the client's account, and are made available via mail or electronic delivery. The information in these reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. We urge clients to carefully review these reports and compare the statements that they receive from their custodian to the reports that we provide.

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

With respect to the AssetMark Platform, CFS may, subject to negotiation with AssetMark, receive certain allowances, reimbursements or services from AssetMark in connection with CFS's Investment Advisory services to its clients, as described below and in the Appendix 1 of the AssetMark Platform Disclosure Brochure.

Under AssetMark's Gold/Platinum Premier Consultant Program, CFS is entitled to receive a quarterly business development allowance for reimbursement for qualified marketing/practice management expenses incurred by CFS. These amounts range from \$5,000 to \$105,000 annually, depending on the amount of the Advisor's client assets managed within the Platform.

AssetMark may also bear the cost of airfare for firms such as CFS to attend AssetMark's annual conference or to conduct due diligence visits to AssetMark's offices. In addition, AssetMark may, from time to time, contribute to the costs incurred by participating firms such as CFS in connection with conferences or other client events conducted by such firms and their representatives.

AssetMark may also provide opportunities for participating firms such as CFS to receive fee reductions and/or allowances in amounts ranging from .02% to .07% of the amount of client assets invested through the Platform. These arrangements are entered into between AssetMark and a firm such as CFS on an individually negotiated basis. CFS may agree to provide AssetMark with introductions to and information concerning its advisory representatives, provide the representatives with information concerning AssetMark's Platform and products, and permit AssetMark to participate in broker- dealer meetings and workshops. In addition to the fee reductions and/or allowances granted the firm by AssetMark, AssetMark may agree to provide the firm or its representatives with organizational consulting, education, training and marketing support.

#### **Item 15 – Custody**

CFS does not provide custodial services to its clients. Client assets are held with banks, financial institutions or registered broker-dealers that are "qualified custodians." Clients will receive statements directly from the qualified custodians at least quarterly. We urge clients to carefully review those statements and compare the custodial records to the reports that we provide them. The information in our reports may vary from custodial statements based on accounting procedures, reporting dates or valuation methodologies of certain securities.

#### **Item 16 – Investment Discretion**

CFS does not take any independent discretionary authority over client accounts. CFS does, however, offer clients participation in the AssetMark Platform, an asset allocation Platform more fully described in the Appendix 1 - Platform Disclosure Brochure attached hereto. Asset allocations composed by a group of independent investment strategists ("Portfolio Strategists") are offered under the Platform, with the different model allocations designed to satisfy a gradient of risk/return objectives. The Portfolio Strategists have no direct relationship with CFS or client, make no analysis of and do not consider the clients' individual circumstances or objectives, and do not tailor the model asset allocation to any specific client's needs, circumstances or objectives, but only to the stated risk/return objectives.

## **Item 17 – Voting Client Securities**

The Client retains the right to vote proxies if the Account is invested in a Mutual Fund, ETF or Variable Annuity Investment Solution. If the Account is invested in an IMA, CMA, or UMA Investment Solution, the Client designates the applicable Discretionary Manager as their agent to vote proxies on securities in the Account. Client acknowledges that as a result of this voting designation they are also designating the Discretionary Manager as their agent to receive proxies, proxy solicitation materials, annual reports provided in connection with proxy solicitations and other materials provided in connection with the above actions relating to the assets in the Account. However, the Client retains the right to vote proxies and may do so by notifying CFS in writing of the desire to vote future proxies.

### **MISCELLANEOUS**

#### *Proxy Voting*

The Advisor will not vote proxies on behalf of advisory Clients' accounts. Although, on rare occasions and only at the Client's request, the Advisor may offer Clients advice regarding corporate actions and the exercise of proxy voting rights.

## **Item 18 – Financial Information**

Registered Investment Advisors are required in this Item to provide you with certain financial information or disclosures about CFS's financial condition. CFS has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

## **Item 19 – Requirements for State-Registered Advisors**

### **EDUCATION AND BUSINESS STANDARDS**

Associated persons of CFS that are involved in determining or giving Investment advice to clients must meet all examination or experience requirements of the state(s) and/or jurisdiction(s) in which the individual provides advisory services.

### **EDUCATIONAL AND BUSINESS BACKGROUND**

Victoria Lynn Woods, Business owner, Public Speaker, Entrepreneur, Author, ChappelWood Financial Services Corp Investment Consulting 1988-current  
ChappelWood Investment Corp. Real Estate Development 1990-current  
(separated CFS and CWI in 2003)  
Victoria's Sleeve Bracelets

Founder of the 84 Acre Financial District of Oklahoma, located in Edmond, OK  
Formal Post High School Education- Tarrant County College  
AIG Financial Advisors Securities Reg. Rep 2003-2006

Damon Matthew King  
Charitable Gift Planning Advisor 2002-2014  
Professional Fundraising Consultant 2014  
Insurance Professional 2014-current  
Investment Advisor 2015-current  
Formal Post High School Education – University of Central Oklahoma  
The American College