

Form ADV

Part 2A

Wiggin Financial Planning, P.A.

March 1, 2019

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This brochure (“Brochure”) provides information about the qualifications and business practices of Wiggin Financial Planning, P.A. (“WFP”). You should review this Brochure in conjunction with our separate brochure supplement (“Supplement”). The Supplement(s) has been prepared for the purpose of providing information about the qualifications and background of the supervised person(s) working with you on our behalf or who may otherwise participate in the advisory services provided to you. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

If you have any questions about the contents of this Brochure or our Supplement(s), please contact us at 954-390-6191 or dwwiggin@wviginfp.com. Additional information about WFP or any of our supervised persons (who are registered under our firm) is also available on the SEC’s Investment Adviser Public Disclosure (“IAPD”) which can be found at www.adviserinfo.sec.gov.

The format/layout of this Brochure has been dictated by the SEC. As such, the Brochure’s table of contents can be found after the “Material Changes” section of this Brochure, not at the beginning of the Brochure. The subsections appearing under each heading shall follow the mandated ordering of the items required to be addressed in this Brochure as set forth in the instructions and guidance issued by the SEC in regard to Part 2A of the Form ADV. WFP’s response to each such item shall immediately follow each numbered item. We encourage any reader of this Brochure to also refer to the SEC’s instructions and guidance related to Part 2A of the Form ADV. Throughout this Brochure, any references to “we,” “our,” “ours,” “us,” etc. are meant to refer to WFP.

II. Material Changes

Date of our last annual ADV update filing: February 2018

Since our last annual update filing, we have had the following material changes to our disclosure brochure:

Item 1 – *Cover Page* – We moved our office location. See Cover Page for new contact information.

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Key Definitions

There are several terms used throughout this Brochure that are defined in the Glossary of the Form ADV. The full Form ADV and its glossary can be found on the SEC's web site at <http://www.sec.gov/about/forms/formadv.pdf>, however, several of the more important terms that are used throughout this Brochure are provided below for your reference. The definitions appear below as they appear in the glossary of the ADV so be mindful that all references made to "you," "your," or "yours" are intended to refer to WFP. Each term is presented in alphabetical order, not necessarily its order of appearance or use in this Brochure.

Advisory Affiliate: Your advisory affiliates are (1) all of your officers, partners, or directors (or any person performing similar functions); (2) all persons directly or indirectly controlling or controlled by you; and (3) all of your current employees (other than employees performing only clerical, administrative, support or similar functions).

Control: Control means the power, directly or indirectly, to direct the management or policies of a person, whether through ownership of securities, by contract, or otherwise. Each of your firm's officers, partners, or directors exercising executive responsibility (or persons having similar status or functions) is presumed to control your firm. A person is presumed to control a corporation if the person: (i) directly or indirectly has the right to vote 25 percent or more of a class of the corporation's voting securities; or (ii) has the power to sell or direct the sale of 25 percent or more of a class of the corporation's voting securities. A person is presumed to control a partnership if the person has the right to receive upon dissolution, or has contributed, 25 percent or more of the capital of the partnership. A person is presumed to control a limited liability company ("LLC") if the person: (i) directly or indirectly has the right to vote 25 percent or more of a class of the interests of the LLC; (ii) has the right to receive upon dissolution, or has contributed, 25 percent or more of the capital of the LLC; or (iii) is an elected manager of the LLC. A person is presumed to control a trust if the person is a trustee or managing agent of the trust.

Management Persons: Anyone with the power to exercise, directly or indirectly, a controlling influence over your firm's management or policies, or to determine the general investment advice given to the clients of your firm. Generally, all of the following are management persons: Your firm's principal executive officers, such as your chief executive officer, chief financial officer, chief operations officer, chief legal officer, and chief compliance officer; your directors, general partners, or trustees; and other individuals with similar status or performing similar functions; The members of your firm's investment committee or group that determines general investment advice to be given to clients; and If your firm does not have an investment committee or group, the individuals who determine general investment advice provided to clients (if there are more than five people, you may limit your firm's response to their supervisors).

Person: A natural person (an individual) or a company. A company includes any partnership, corporation, trust, limited liability company ("LLC"), limited liability partnership ("LLP"), sole proprietorship, or other organization.

Related Person: Any advisory affiliate and any person that is under common control with your firm.

Supervised Person: Any of your officers, partners, directors (or other persons occupying a similar status or performing similar functions), or employees, or any other person who provides investment advice on your behalf and is subject to your supervision or control.

IV. Advisory Business

IV.(A). WFP at a Glance

Firm Profile

WFP is a fee-only[®] financial planning company. We offer general financial planning. We help clients review their current financial position and assist in developing written financial goals. We provide written analysis and recommendations in the form of a financial plan. We help our clients implement and monitor their plan.

WFP also provides Investment management services. We do not specialize in any particular type of investment service.

Years in Business

Date of formation: July 17, 2009

Date of initial investment adviser registration: December 12, 2009.

Direct Principal Owners

Deborah Wiggin is the 100% owner of the Firm.

IV.(B). WFP's Advisory Services

In this section, we will describe the services we offer as well as the fees that correspond to those services. As far as investment products on which we may provide advice, those product types are identified in the grid below.

Fiduciary Matters

As a result of the U. S. Department of Labor's ("DOL") partial enactment of its Fiduciary Rule, we are now subject to the fiduciary standards of the DOL and the ERISA laws. As such, we are required to give advice that is in the best interest of the retirement investor.

- This includes the prudence standard, which holds that advice must meet a professional standard of care
- It also includes the loyalty standard, meaning advice must be based on the interests of the customer, rather than the competing financial interests of the advisor.

Further, we can charge no more than reasonable compensation and we cannot make misleading statements about investment transactions, compensation, and conflicts of interest.

Product Type Limitations

We generally provide investment advice in relation to the following specific types of securities/investments.

<input checked="" type="checkbox"/>	Exchange listed equities	<input checked="" type="checkbox"/>	Mutual funds (closed-end and open-end funds)
<input type="checkbox"/>	Over the counter equities	<input checked="" type="checkbox"/>	Exchange traded funds
<input type="checkbox"/>	Equities of foreign issuers	<input checked="" type="checkbox"/>	U.S. government securities
<input type="checkbox"/>	Interests in privately offered securities (hedge funds, venture capital funds,	<input type="checkbox"/>	Options on securities

	private equity funds, etc.) involving any of the following: <ul style="list-style-type: none"> • Real estate • Oil and gas • Mortgages or other receivables/assets 		
<input type="checkbox"/>	Warrants	<input type="checkbox"/>	Options on commodities
<input checked="" type="checkbox"/>	Corporate debt securities (other than commercial paper)	<input type="checkbox"/>	Options on futures
<input type="checkbox"/>	Commercial paper	<input type="checkbox"/>	Futures contracts (tangibles)
<input checked="" type="checkbox"/>	Certificates of deposit	<input type="checkbox"/>	Futures contracts (intangibles)
<input checked="" type="checkbox"/>	Municipal securities	<input type="checkbox"/>	
<input type="checkbox"/>	Variable life insurance	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	Variable annuities	<input type="checkbox"/>	

Specialized Services

As designated below, we specialize in the following services. As applicable, a description of each such service is also included below.

- 1. Financial planning. Refer to our description below regarding our Financial Planning services.
- 2. Quantitative analysis.
- 3. Market timing services.
- 4. Other:

Our Services:

Service:	<i>Financial Planning</i>
Service description:	<p>WFP offers financial plans that encompass topics such as cash management, investment management, insurance and estate planning.</p> <p>Financial planning information will be obtained through personal interviews with you concerning your current financial status, future goals and attitudes towards risk. Related documents supplied by you are reviewed, along with other data we may gather from you. A written report may be issued.</p> <p>You are under no obligation to act on WFP's recommendation. The Client is free to execute our plan and recommendations through any agent or broker of their choosing.</p>
Use of discretion:	We do not possess or exercise investment discretion in connection with this service offering.
Service fees:	<p>For the service described above, we may charge fees in the following manner:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Non-annual, flat/fixed fee. Our non-annual, flat/fixed fees for our financial planning services range from \$350 to \$7500 approximately. For a net worth over \$5 million a quote should be requested. We may require a portion of the flat fee to be paid in advance before commencing the financial planning work. <input checked="" type="checkbox"/> Hourly fees. Certain of our financial planning services are done on an hourly basis. The hourly fee is based on a rate of \$150.00 per hour, and an estimate of the

	<p>time required for the development of the plan. The total plan fee is presented to the Client prior to the commencement of work, and is expected to be paid upon its completion.</p> <p>The specific fee for this service will be quoted prior to the financial planning agreement being executed and will be determined according to the complexity of the plan as well as the extent of service you may desire. An estimated fee will be given upon financial plan agreement execution. All fees are negotiable at our sole discretion. Specific fee arrangements will be set forth in your financial planning agreement.</p>
<p>Other fees:</p>	<p>In addition to our service fees, you may be assessed other fees by parties independent from us. You may also incur, relative to certain investment products (such as mutual funds), charges imposed directly at the investment product level (i.e. advisory fees, administrative fees, and other fund expenses.) Brokerage fees/commissions charged to you for securities trade executions may be billed to you by the broker-dealer or custodian of record for your account, not us. Any such fees are exclusive of, and in addition to our compensation. You will be solely and directly responsible for all fees, including fees other than those we may bill directly to you.</p> <p>Refer to Item V.(E) and Item 12 for additional information regarding other fees such as sales compensation, brokerage fees, custodial fees, etc.</p>
<p>Fee collection:</p>	<p>For the service described above, we receive our service fees by the following method(s):</p> <p><input checked="" type="checkbox"/> direct invoice to you</p> <p>You will be invoiced by the fifth business day of the month subsequent to the most recently ended billing period. Payments are due on or by the final business day of the month in which the invoice is generated. Specific fee arrangements will be set forth in your financial planning agreement with us.</p>
<p>Fee frequency/timing:</p>	<p>For the service described above, the frequency and timing of our fee collection process occurs as follows: <input type="checkbox"/> quarterly, <input type="checkbox"/> monthly, <input checked="" type="checkbox"/> in advance, <input checked="" type="checkbox"/> in arrears, or <input type="checkbox"/> a portion in advance and a portion in arrears. Specific fee arrangements will be set forth in your financial planning agreement with us.</p>
<p>Advanced billing and refunds:</p>	<p>As described above, part of our advisory fees may be charged in advance. Fees paid in advance will be considered earned and non-refundable to you up to the effective termination of the financial planning agreement as the termination process is described in the financial planning agreement. Upon receipt of a proper notice of termination (“Termination Notice”) as described in the financial planning agreement, we will calculate a pro rata refund of any fees not yet earned by us after the effective termination date of the financial planning agreement. The pro rata refund will equal the total number of calendar days remaining in the billing period after the date of the termination of the financial planning agreement to the end of that billing period divided by the total number of calendar days in that billing period. The result of that calculation will be multiplied by the total fee already paid for that billing period. The result of that calculation will represent the refund owed to you. Refunds of advance payments owed back to you shall be paid as soon as reasonably possible but not sooner than ten (10) business days after our receipt of a proper Termination Notice.</p> <p>Specific fee arrangements will be set forth in your financial planning agreement with us.</p>

Service:	<i>Ongoing Asset Management</i>																						
Service description:	<p>Our ongoing asset management services can be described as follows:</p> <p>On a discretionary and/or non-discretionary basis, we may design, revise, and reallocate a custom investment portfolio for you. Investments are determined based upon factors such as your investment objectives, risk tolerance, net worth, net income, age, time horizon, tax situation and other various suitability factors.</p>																						
Use of discretion:	<p>Depending on your individual needs and the services you request of us, we may exercise full discretion as to the following elements.</p> <p> <input checked="" type="checkbox"/> Securities to be bought or sold <input checked="" type="checkbox"/> Amount of the securities to be bought or sold <input checked="" type="checkbox"/> Timing as to when such securities are to be bought or sold <input checked="" type="checkbox"/> Broker-dealer and/or custodian to be used <input type="checkbox"/> Commission rates to be paid for securities brokerage activities <input type="checkbox"/> Other: <input type="checkbox"/> None </p> <p>Our specific discretionary authority will be set forth in your service agreement (“Agreement”) with us.</p>																						
Service fees:	<p>For the service described above, we will charge fees in the following manner:</p> <p><input checked="" type="checkbox"/> Annual, asset-based fees.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #cccccc;"> <th colspan="2" style="text-align: center;">Asset Based Fee Schedule</th> </tr> <tr style="background-color: #cccccc;"> <th style="text-align: center;">Account Portfolio Value</th> <th style="text-align: center;">Annual Percentage</th> </tr> </thead> <tbody> <tr> <td>Under \$150,000</td> <td>Negotiable</td> </tr> <tr> <td>\$150,000 to \$2 million</td> <td>1.25%</td> </tr> <tr> <td>\$2 million to \$3 million</td> <td>1.00%</td> </tr> <tr> <td>\$3 million to \$4 million</td> <td>0.75%</td> </tr> <tr> <td>Over \$4 million</td> <td>Negotiable</td> </tr> </tbody> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #cccccc;"> <th colspan="2" style="text-align: center;">Other fee/account maintenance conditions...</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Minimum account/portfolio balance (initial):</td> <td> <input checked="" type="checkbox"/> None <input type="checkbox"/> \$ </td> </tr> <tr> <td style="text-align: center;">Minimum account/portfolio balance (ongoing):</td> <td> <input checked="" type="checkbox"/> None <input type="checkbox"/> \$ </td> </tr> <tr> <td style="text-align: center;">Minimum annual fee:</td> <td> <input checked="" type="checkbox"/> None <input type="checkbox"/> \$ </td> </tr> </tbody> </table> <p>All fee arrangements are negotiable at our sole discretion. Specific fee arrangements will be set forth in your service agreement (“Agreement”) with us.</p>	Asset Based Fee Schedule		Account Portfolio Value	Annual Percentage	Under \$150,000	Negotiable	\$150,000 to \$2 million	1.25%	\$2 million to \$3 million	1.00%	\$3 million to \$4 million	0.75%	Over \$4 million	Negotiable	Other fee/account maintenance conditions...		Minimum account/portfolio balance (initial):	<input checked="" type="checkbox"/> None <input type="checkbox"/> \$	Minimum account/portfolio balance (ongoing):	<input checked="" type="checkbox"/> None <input type="checkbox"/> \$	Minimum annual fee:	<input checked="" type="checkbox"/> None <input type="checkbox"/> \$
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Minimum account/portfolio balance (ongoing):	<input checked="" type="checkbox"/> None <input type="checkbox"/> \$																						
Minimum annual fee:	<input checked="" type="checkbox"/> None <input type="checkbox"/> \$																						
Other fees:	In addition to our service fees, you may be assessed other fees by parties independent from us. You may also incur, relative to certain investment																						

	<p>products (such as mutual funds), charges imposed directly at the investment product level (i.e. advisory fees, administrative fees, and other fund expenses.) Brokerage fees/commissions charged to you for securities trade executions may be billed to you by the broker-dealer or custodian of record for your account, not us. Any such fees are exclusive of, and in addition to our compensation. You will be solely and directly responsible for all fees, including fees other than those we may bill directly to you.</p> <p>Refer to Item V.(E) and Item 12 for additional information regarding other fees such as sales compensation, brokerage fees, custodial fees, etc.</p>
<p>Fee collection:</p>	<p>For the service described above, we receive our service fees by the following method(s):</p> <p><input checked="" type="checkbox"/> automatic fee deduction via the custodian; and/or <input checked="" type="checkbox"/> direct invoice to you.</p> <p><i>Billing Via Custodian.</i></p> <p>Contemporaneously with the execution of the Agreement, you will be asked to sign an authorization that will allow the custodian of any of your account(s) to debit the account(s) the amount of our service fees and remit the fee to us. The authorization will remain valid unless and until we receive a written revocation of such authorization from you. In connection with this fee deduction process, the custodian will send you a statement, at least quarterly, indicating:</p> <ul style="list-style-type: none"> • all amounts disbursed from the account; and • the amount of advisory fees deducted on our behalf. <p><i>Direct billing.</i></p> <p>If so desired, you may choose to be billed directly by us for our service fees. If so chosen, you will be invoiced by the fifth business day of the month subsequent to the most recently ended billing period. Payments are due on or by the final business day of the month in which the invoice is generated.</p> <p>Specific fee arrangements will be set forth in your Agreement with us.</p>
<p>Fee frequency/timing:</p>	<p>For the service described above, the frequency and timing of our fee collection process occurs as follows: <input checked="" type="checkbox"/> quarterly, <input type="checkbox"/> monthly, in advance, or <input checked="" type="checkbox"/> in arrears.</p> <p>Specific fee arrangements will be set forth in your Agreement with us.</p>

IV.(C). Customization of Advisory Services

To the fullest extent possible, we will endeavor to tailor our advisory services to meet the specific needs of each and every client. In order to determine a suitable course of action for an individual client, we will perform a review of our clients’ financial circumstances and other factors that may influence the investment recommendations we may

make to you from time to time. Such review may include, but would not necessarily be limited to, investment objectives, consideration of a client's overall financial condition, income and tax status, personal and business assets, risk profile, and other factors unique to a client's particular circumstances.

In making investment recommendations on behalf of a client, we will rely on a data gathering document or other questionnaire, which would be completed based on information provided by a client.

Our clients are free to impose any restrictions or other conditions with regard to how we provide our advisory services. If we agree to such restrictions and/or conditions, please be advised that restrictions and guidelines that you impose on our investment management functions may affect the composition and performance of custom portfolios (as a result, performance of custom portfolios within the same investment objective may differ and you should not expect that the performance of a custom portfolio will be identical to any other individual's portfolio performance) as well as any recommendations provided to you.

IV.(D). Wrap Fee Program Participation

Refer to item IV.(B) above for details as to our participation/involvement with wrap programs.

IV. (E). Assets Under Management ("AUM")

AUM (discretionary):	\$15,947,355.00
AUM (non-discretionary):	\$0
Total AUM:	\$15,947,355.00
Date of AUM calculation:	December 31, 2018

V. Fees and Compensation

V.(A). WFP Advisory Fees

Refer above to Item IV.(B).

V.(B). Fee Collection Process

Refer above to Item IV.(B).

V.(C). Other Fee/Expenses.

Refer above to Item IV.(B).

V.(D). Fees Charged in Advance

Refer above to Item IV.(B).

V.(E). Additional Compensation

Item V.(E) requires us to address situations in which we or any of our supervised persons accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. No one associated with WFP is licensed to sell securities and other investment products, therefore the firm has nothing to disclose here.

V.(E).(1). Conflicts of Interest

Since we have no one that is licensed to sell securities or other investment products, we do not receive any additional compensation that would result in a conflict of interest.

V.(E).(2). Client-Directed Brokerage

We do not permit client directed brokerage.

V.(E).(3). Brokerage Compensation

We are not registered as a broker-dealer and thus, we do not receive transaction-based compensation for securities-related activities.

V.(E).(4). Advisory Fee Offset

In the event that we or our supervised persons receive compensation other than our advisory fees as described above in Item IV.(B), we will not adjust our advisory fees to offset those other fees.

VI. Performance-Based Fees and Side-By-Side Management

We do not charge performance-based fees.

VII. Types of Clients

We will generally provide our services to the following types of clients.

- Individuals
- High net worth individuals
- Business or corporate entities

Unless otherwise specified on a per client basis, we generally do not impose (1) a minimum asset/account balance upon engagement by a client or on an ongoing basis or (2) a minimum annual fee.

VIII. Methods of Analysis, Investment Strategies and Risk of Loss

VIII.(A). Methods of Analysis

At the center of our investment approach is diligent research. We use a tactical approach to investment management overlaying strategic asset allocation models. We take a position in an asset class when the asset class is selling at a considerable discount to its fair value giving our clients opportunity for investment success.

Our asset allocation decisions assume a minimum three year time frame giving us confidence those underlying investment fundamentals, rather than short-term market sentiment, will drive returns. However, we continually review our positions, which occasionally forces changes in the portfolio allocations based on a long-term horizon---most of the time it doesn't.

We believe not only in extensive research but a disciplined investment process which helps us make clear decisions, even in highly stressful and uncertain times.

Client portfolios are based on individual need, risk tolerance and our understanding of the economic environment.

VIII.(B). Investment Strategies

In the course of our management process and as appropriate on a case by case basis, we will employ any of the following investment strategies. For a description of the risks related to each particular investment strategy, see the information following each strategy description. The codes used below relate to risks described further below in this section.

Long-Term Purchases

Long-term purchases generally involve the acquisition of an investment instrument and holding it for a period longer than one year.

Key risk(s): Capital Risk, Economic Risk, Financial Risk, and Inflation Risk.

Short-Term Purchases

Short-term purchases generally involve the acquisition of an investment instrument and holding it for a period of not more than one year.

Key risk(s): Capital Risk, Economic Risk, Financial Risk, and Inflation Risk.

Margin Trading

Wiggin Financial Planning does not participate in margin trading.

Options

Wiggin Financial Planning does not utilize individual option strategies; however, mutual fund managers chosen by WFP may use option strategies.

VIII.(C). Risk Disclosures

Capital Risk

Capital risk is one of the most basic, fundamental risks of investing; it is the risk that you may lose 100 percent of your money. All investments carry some form of risk and the loss of capital is generally a risk for any investment instrument.

Credit Risk

Credit risk can be a factor in situations where an investment's performance relies on a borrower's repayment of borrowed funds. With credit risk, an investor can experience a loss or unfavorable performance if a borrower does not repay the borrowed funds as expected or required. Investment holdings that involve forms of indebtedness (i.e. borrowed funds) are subject to credit risk.

Currency Risk

Fluctuations in the value of the currency in which your investment is denominated may affect the value of your investment and thus, your investment may be worth more or less in the future. All currency is subject to swings in valuation and thus, regardless of the currency denomination of any particular investment you own, currency risk is a realistic risk measure. That said, currency risk is generally a much larger factor for investment instruments denominated in currencies other than the most widely used currencies (U.S. dollar, British pound, Euro, Japanese yen, etc.).

Economic Risk

The prevailing economic environment is important to the health of all businesses. Some companies, however, are more sensitive to changes in the domestic or global economy than others. These types of companies are often referred to as cyclical businesses. Countries in which a large portion of businesses are in cyclical industries are thus also very economically sensitive and carry a higher amount of economic risk. If an investment is issued by a party located in a country that experiences wide swings from an economic standpoint or in situations where certain elements of an investment instrument are hinged on dealings in such countries, the investment instrument will generally be subject to a higher level of economic risk.

Financial Risk

Financial risk is represented by internal disruptions within an investment or the issuer of an investment that can lead to unfavorable performance of the investment. Examples of financial risk can be found in cases like Enron or many of the dot com companies that were caught up in a period of extraordinary market valuations that were not based on solid financial footings of the companies.

Higher Trading Costs

For any investment instrument or strategy that involves active or frequent trading, you may experience larger than usual transaction-related costs. Higher transaction-related costs can negatively affect overall investment performance.

Inflation Risk

Inflation risk involves the concern that in the future, your investment or proceeds from your investment will not be worth what they are today. Throughout time, the prices of resources and end-user products generally increase and thus, the same general goods and products today will likely be more expensive in the future. The longer an investment is held, the greater the chance that the proceeds from that investment will be worth less in the future than what they are today. Said another way, a dollar tomorrow will likely get you less than what it can today.

Interest Rate Risk

Certain investments involve the payment of a fixed or variable rate of interest to the investment holder. Once an investor has acquired or has acquired the rights to an investment that pays a particular rate (fixed or variable) of interest, changes in overall interest rates in the market will affect the value of the interest-paying investment(s) they hold. In general, changes in prevailing interest rates in the market will have an inverse relationship to the value of existing, interest paying investments. In other words, as interest rates move up, the value of an instrument paying a particular rate (fixed or variable) of interest will go down. The reverse is generally true as well.

Legal/Regulatory Risk

Certain investments or the issuers of investments may be affected by changes in state or federal laws or in the prevailing regulatory framework under which the investment instrument or its issuer is regulated. Changes in the regulatory environment or tax laws can affect the performance of certain investments or issuers of those investments and thus, can have a negative impact on the overall performance of such investments.

Liquidity Risk

Certain assets may not be readily converted into cash or may have a very limited market in which they trade. Thus, you may experience the risk that your investment or assets within your investment may not be able to be liquidated quickly, thus, extending the period of time by which you may receive the proceeds from your investment. Liquidity risk can also result in unfavorable pricing when exiting (i.e. not being able to quickly get out of an investment before the price drops significantly) a particular investment and therefore, can have a negative impact on investment returns.

Market Risk

The market value of an investment will fluctuate as a result of the occurrence of the natural economic forces of supply and demand on that investment, its particular industry or sector, or the market as a whole. Market risk may affect a single issuer, industry or sector of the economy or may affect the market as a whole. Market risk can affect any investment instrument or the underlying assets or other instruments held by or traded within that investment instrument.

Operational Risk

Operational risk can be experienced when an issuer of an investment product is unable to carry out the business it has planned to execute. Operational risk can be experienced as a result of human failure, operational inefficiencies, system failures, or the failure of other processes critical to the business operations of the issuer or counter party to the investment.

Past Performance

Charting and technical analysis are often used interchangeably. Technical analysis generally attempts to forecast an investment's future potential by analyzing its past performance and other related statistics. In particular, technical analysis often times involves an evaluation of historical pricing and volume of a particular security for the purpose of forecasting where future price and volume figures may go. As with any investment analysis method, technical analysis runs the risk of not knowing the future and thus, investors should realize that even the most diligent and thorough technical analysis cannot predict or guarantee the future performance of any particular investment instrument or issuer thereof.

Strategy Risk

There is no guarantee that the investment strategies discussed herein will work under all market conditions and each investor should evaluate his/her ability to maintain any investment he/she is considering in light of his/her own investment time horizon. Investments are subject to risk, including possible loss of principal.

VIII.(D). Investment-Specific Risks

There is no single type of investment instrument that we predominantly recommend, however, please be mindful that all investments carry some form and degree of risk. Certain types of investments carry greater types and levels of risk than others and you should make sure that you fully understand not only the investment product itself but also the attendant risk factors associated with such products.

IX. Disciplinary Information

The purpose of this section is for us to disclose to you any legal, disciplinary, or other events that you may consider material in your evaluation of our firm or the integrity of our management. Following each of the numbered items below, we shall provide details as to each applicable matter or we will answer "No" or "N/A." This information is presented in a question and answer format. The time period required to be covered by our answers in this section is ten years from the date of the events requiring disclosure.

IX.(A). Criminal or Civil Action

In any domestic, foreign, or military court of competent jurisdiction, has WFP or any of its management persons...		
Been convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Been identified as the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Been found to have been involved in a violation of an investment-related statute or regulation; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Been the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, your firm or a	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

management person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order?		
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IX.(B). Administrative Proceedings

Has WFP or any of its management persons been the subject of an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which WFP or any of its management persons...		
Was found to have caused an investment-related business to lose its authorization to do business; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority...		
denying, suspending, or revoking the authorization of WFP or one of its management persons to act in an investment-related business;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
barring or suspending WFP or one of its management person's association with an investment-related business;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
otherwise significantly limiting WFP or one of its management person's investment-related activities; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
imposing a civil money penalty of more than \$2,500 on WFP or one of its management persons?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

IX.(C). SRO Proceedings

Has WFP or any of its management persons been involved in a SRO proceeding in which WFP or any of its management persons ...		
Was found to have caused an investment-related business to lose its authorization to do business; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

X. Other Financial Industry Activities and Affiliations

The following information will address any active or pending financial industry affiliations that you need to know about for the purpose of identifying any related conflicts of interest that you might consider material in regard to letting us handle your investment advisory needs.

X.(A). Broker-Dealers

Neither WFP nor any of its management persons is registered as a broker-dealer nor do either parties have an application pending or otherwise in process for the purpose of seeking registration as a broker-dealer.

X.(B). Futures Commission Merchants, Introducing Brokers, Commodity Trading Advisors, Commodity Pool Operators

Neither WFP nor any of its management persons is registered as a futures commission merchant, an introducing broker, a commodity trading adviser, or a commodity pool operator, nor do either parties have an application

pending or otherwise in process for the purpose of seeking registration as any of these types of firms. Further, none of our management persons are registered as or currently seeking registration as associated persons of any of these types of firms.

X.(C). Related Persons

The following information will address any relationship or arrangement that is material to our advisory business or our clients that we or any of our management persons have with any of our related persons. In any such case, the related person is identified below and we have also addressed the nature of any conflict(s) arising out of this relationship/arrangement and how we address such conflict(s). No such relationships exist.

X.(D) Use of Other Investment Advisors

We do not use any other investment advisors in the process of providing our advisory services.

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

XI.(A) Code of Ethics

We take great pride in our commitment to serving our clients' needs and the integrity with which we conduct our business. In our recent history, the financial services industry has come under significant scrutiny, especially in the area of the inherent responsibility of financial professionals to behave in the best interests of their clients.

We have developed a Code of Ethics ("Code") as a means of memorializing our vision of appropriate and professional conduct in carrying out the business of providing investment advisory services. Our Code addresses issues such as the following:

- Standards of conduct and compliance with applicable laws, rules, and regulations
- Protection of material non-public information
- The addressing of conflicts of interest
- Employee disclosure and reporting of personal securities holdings and transactions
- The firm's IPO and private placement policy
- The reporting of violations of the Code
- Educating employees about the Code
- Enforcement of the Code

Each of our representatives has been furnished with a copy of our Code and has signed their names to a written acknowledgement attesting to their understanding of the Code and acceptance of its terms. A copy of our Code is available to all current and/or prospective clients upon request.

XI.(B) Participation in Client Trading

The information in this item is intended to address situations in which we or one of our related persons may have a material financial interest in the investment instruments we may recommend to you. No such arrangements exist.

XI.(C) Trading Alongside Our Clients

We do not engage in any trading whereby we invest in the same securities that are recommended to our clients.

XI.(D) Batch Trading

Transactions for the client’s account generally will be effected independently, unless we decide to purchase or sell the same securities for several clients at the same or approximately the same time. We may (but are not obligated to) combine or “batch” such orders in order to obtain best execution or to negotiate more favorable transaction rates. To the extent that we elect to aggregate client orders for the purchase or sale of securities, including securities in which our associated persons may invest, we will generally do so in accordance with the parameters set forth in SEC No-Action Letter, *SMC Capital, Inc.* We will not receive any additional compensation or remuneration as a result of a batched order.

XII. Brokerage Practices

The purpose of this Item is to present to you the factors that we take into consideration when (1) selecting or recommending broker-dealers to you for the purpose of effecting transactions on your behalf and (2) for determining the reasonableness of such broker-dealers’ compensation related to such transactions.

WFP is not a broker-dealer. Although not all-inclusive, WFP will recommend the following brokers of record and their corresponding custodian:

Broker of Record	Custodian
TD Ameritrade, Inc.	

Factors that WFP considers in recommending certain broker-dealers or custodians to clients may include such entity’s financial strength, reputation, execution, pricing, and service. WFP does not receive any type of compensation for recommending clients to broker dealers or custodians.

In seeking best execution, the determinative factor is not always the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of brokerage services, including factors such as execution capability, commission rates, and responsiveness. Accordingly, although WFP will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for the client’s account transactions.

Clients are required to use the broker dealer and custodian recommended by WFP.

XII.(A).(1). Research and Soft Dollar Benefits

Soft dollar benefits are items such as research or other products or services (other than the typical execution and other brokerage services available to all other investment advisers) that we may receive from a broker-dealer or other party in connection with the client securities transactions we direct to that/a broker-dealer(s). We do not participate in any soft dollar arrangements.

XII.(A).(2). Brokerage for Client Referrals

In certain circumstances, firms like ours may receive client referrals as a result of recommending particular broker-dealers or other service providers. We, however, do not participate in any formal arrangements wherein we receive client referrals from any particular broker-dealer in return for selecting or recommending such broker-dealer.

XII.(A).(3). Directed Brokerage

This item is intended to address situations where we may recommend, request, or require you to provide us instructions as to how to direct brokerage activity on your behalf.

XII.(A).(3)(a). Directed Brokerage – Recommended, Requested, or Required

Not all investment advisers require their clients to direct brokerage activity through any particular broker-dealer. We require our clients to use the broker dealer recommended by us.

XII.(B). Order Batching

The Firm does not do any block trading.

XIII. Review of Accounts

XIII.(A). Review of Accounts or Financial Plans

Review of Client Accounts

Accounts are reviewed quarterly by the President of our Firm, Deborah Wiggin, in addition, Ms. Wiggin is available to review accounts upon clients' request. A quarterly review will be conducted to discuss investments, allocation, financial plan, insurance products and other pertinent areas. There is no minimum number of accounts assigned for the reviewer. The review process contains each of the following elements:

- Assess client's goals and objectives;
- Evaluate the strategy which has been employed;
- Monitor the portfolio; and
- Address the need to rebalance.

Additional account reviews may be triggered by any one or more of the following events:

- Change in performance;
- Change in management style of any fund, and
- Change in client's objectives.
- A change in the client's personal circumstances such as an illness, death, birth, divorce, etc.

Review of Financial Plans

Refer above to Section IV.(B).

XIII.(B). Non-Periodic Account Reviews

Events that may trigger further client account reviews in addition to the standard quarterly review process may include, but would not be limited to, a notable increase in the volume of requests by the client to effect transactions in his/her accounts, where such transactions may appear to be inconsistent with the client's previously stated investment objectives. Other factors may include requests by the client to liquidate certain securities positions/contracts where such transactions may appear to be inconsistent with the client's previously stated investment objectives. Additional triggering factors could be the performance on an individual account being an outlier to the performance of accounts with similar investment objectives, and a very important trigger would be customer complaints. This last trigger would be a prime example of a trigger for an intermittent review of a client account.

XIII.(C). Reports to Clients

TD Ameritrade, Inc. (CRD # 7870) sends clients monthly account statements. We strongly urge every client to carefully review these statements.

Wiggin Financial Planning, P.A. does not send monthly account statements; however, we do send quarterly statements showing the end of quarter balance, plus fees and calculations of fees. We strongly urge a careful review of our quarterly statement and a comparison with the statement sent by TD Ameritrade, Inc.

XIV. Client Referrals and Other Compensation

XIV.(A). Compensation We Receive

We do not receive any compensation for client referrals.

XIV.(B). Compensation We Pay

Under certain circumstances, firms like ours will compensate other parties for having referred clients or potential investment advisory clients to them. These sorts of arrangements are generally referred to as “solicitor” arrangements. We do not participate in any solicitor arrangements.

XV. Custody

We engage in certain activities that result in us being deemed to have custody of certain of our client’s funds and/or securities.

- Automatic fee deduction from your brokerage or other trading accounts
- Physical possession or control (even temporary) of client funds or securities
- The ability to gain access to any client funds and/or securities
- One of our related persons has custody of funds and/or securities subject to our investment advisory services
- We or one of our related persons serves as the general partner, managing member, or other similar type of control person to an investment fund to which we provide investment advisory services.

As stated previously in Item XIII.(C), your account statements will be provided by the qualified custodian that maintains physical possession of your accounts/assets. In the event that we also provide you information related to your accounts, you are urged to review that information to the information contained on the account statements or other statements received from the qualified custodian.

XVI. Investment Discretion

As part of our investment advisory services, we will generally seek and obtain your authorization to carry out part of our services on a purely discretionary basis. We will memorialize your authorization of our discretionary authority in our Client Profile & Advisory Agreement.

If you have authorized us to do so, we will exercise discretion over the following areas.

- 1) The specific securities to be bought or sold on the client’s behalf
- 2) The amount of securities to be bought or sold on the client’s behalf
- 3) The particular broker or dealer to be used for arranging client securities transactions

We will have authority to exercise complete discretion with regard to the above named factors without restriction. As may be separately agreed to in writing, we will observe any other specific limitations that may be imposed by you in relation to this discretionary authority.

If you have a non-discretionary relationship with us, we will make certain recommendations that must be authorized by you prior to our facilitation of any such transactions.

XVII. Voting Client Securities

XVII.(A). Proxy Voting

We do not vote proxies on behalf of any securities you own.

XVII.(B). Proxy Voting

Since you have not authorized us to vote proxies on your behalf, we will not do so. Proxies related to the securities you own will be disseminated as dictated by the issuer, transfer agent, or as otherwise set forth in the account opening paperwork you completed for the custodian holding your account/assets. If you have questions related to a particular proxy notice, please call us at 407-622-0018.

XVIII. Financial Information

XVIII.(A). Balance Sheet

We do not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. As a result, we are not required to provide our clients with a copy of our balance sheet from our most recently completed fiscal year.

XVIII.(B). Adverse Financial Condition

In the event that we have discretionary authority or custody of any of our clients' assets or if we require or solicit prepayment of more than \$500 in fees per client, six months or more in advance, we are required to disclose any financial condition that is reasonably likely to impair our ability to meet contractual commitments with our clients. Regardless of the fact that we do not maintain or exercise discretionary authority or have custody of any of our clients' assets and we do not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance, we have no adverse financial conditions to report.

XVIII.(C). Bankruptcy-Related Matters

During the past ten years, WFP has not been the subject of a bankruptcy petition.

XIX. Additional Requirements for State-Registered Advisors

XIX.(A). Control Persons

The following individuals represent our principal executive officers or management persons. You will also find in the information below, the formal educational and background for each of these persons.

Name: Deborah Wiggin		
Year of Birth:	1950	
Formal education after high school.		
Institution	Degree / Major	Date(s)
Certified & Court Appointed Family Mediator	N/A	2001
Institute for Certified Divorce Planners		1994
Nova Southeastern University	MBA	1984
University of New Hampshire	BA	1971
The Kinder Institute	Registered Life Planner	2004
CFP Board	Certified Financial Planner	1991
Business background for the preceding five years.		
Entity	Posit	Date(s)
Wiggin Financial Planning P.A.	President	2009 - Present
Miller, Wiggin & Associates	President	1992 - 2009

XIX.(B). Non-Investment Advisory Activities

In addition to the investment advisory services we offer as we have described in this Brochure, we offer the following services.

	Business Activity	Approximate Hours Per Month Spent
<input checked="" type="checkbox"/>	None	
<input type="checkbox"/>	Brokerage services related to securities	
<input type="checkbox"/>	Brokerage or advisory services related to insurance	
<input type="checkbox"/>	Brokerage or advisory services related to futures or commodities	
<input type="checkbox"/>	Banking services	
<input type="checkbox"/>	Accounting or bookkeeping services	
<input type="checkbox"/>	Legal services	
<input type="checkbox"/>	Real estate-related services	

XIX.(C). Performance-Based Fees

For a description of how we calculate any performance-based fees that we may charge, please refer back to Item V and Item VI of this Brochure.

XIX.(D). Management Persons – Other Disclosures

None

XIX. (E). Relationship between Management Persons and Issuers

None