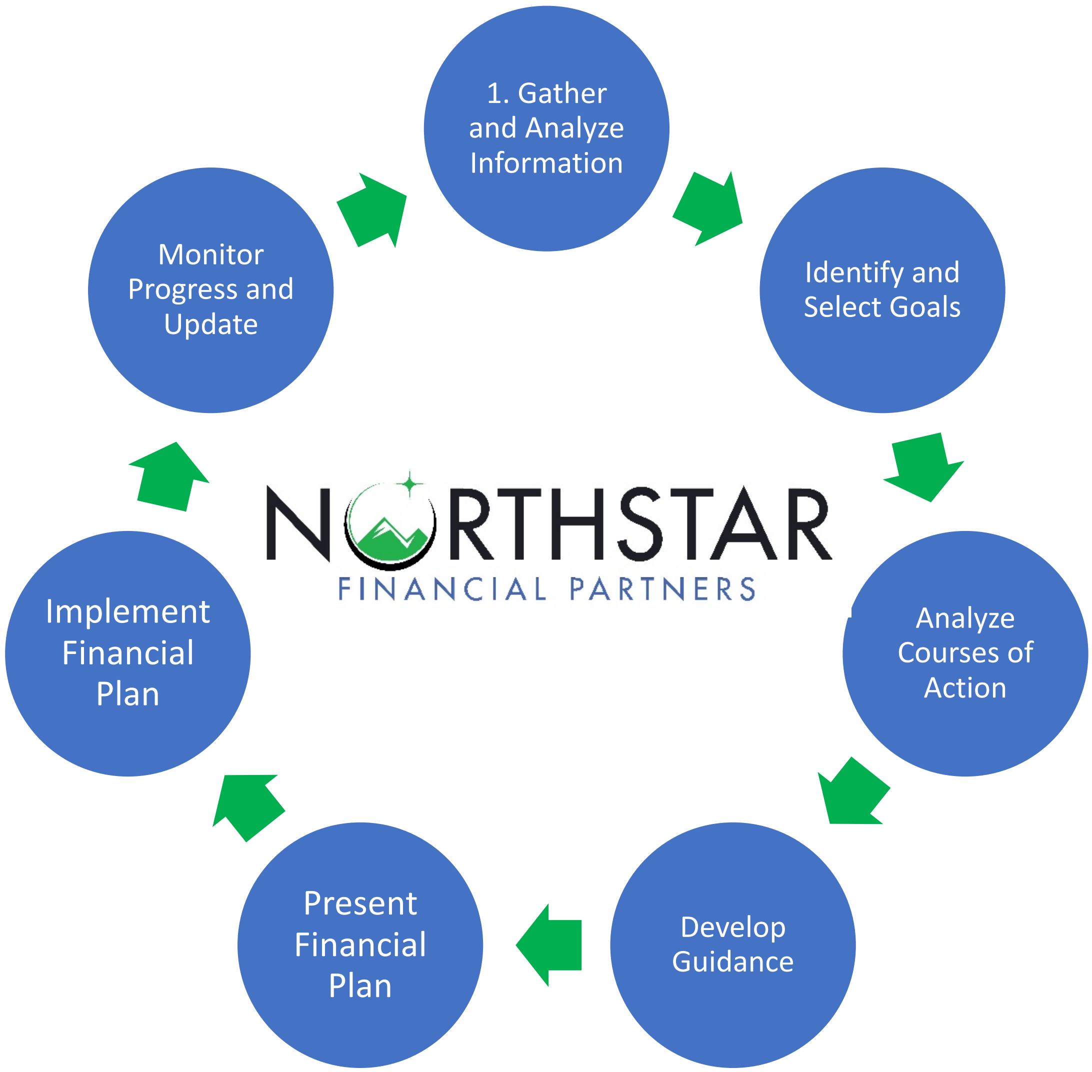

NorthStar Financial Partners recognize the importance in preparing a sound financial plan for our clients. We set the stage for them to move towards a future where they are in control of their finances and can actively move to achieve their financial goals and ambitions. As fiduciaries, we act prudently when collecting client information and document our duty to our clients-We adhere to the Certified Financial Planning Board (CFP Board) of standards for developing our financial plans.

In developing these documents for our clients, here are the detailed steps that we take:

1. **GATHER INFORMATION AND ANALYZE THE CLIENT'S PERSONAL AND FINANCIAL CIRCUMSTANCES**

a. **Obtaining Information.** Describe to the client the information concerning the client's personal and financial circumstances that is needed to develop a financial plan, and work with the client to obtain the information needed.

i. Examples of qualitative or subjective information include the client's health, life expectancy, family circumstances, values, attitudes, expectations, earnings potential, risk tolerance, goals, needs, priorities, and current course of action.

ii. Examples of quantitative or objective information include the client's age, dependents, other professional advisors, income, expenses, cash flow, savings, assets, liabilities, available resources, liquidity, taxes, employee benefits, government benefits, insurance coverage, estate plans, education and retirement accounts and benefits, and capacity for risk.

b. **Analyzing Information.** Analyze the qualitative and quantitative information to assess the client's personal and financial circumstances.

2. IDENTIFY AND SELECT GOALS

a. **Identifying Potential Goals.** Discuss with the client the assessment of the client's financial and personal circumstances. Help the client identify goals, noting the effect that selecting a particular goal may have on other goals. In helping the client identify goals, we discuss with them, and apply, reasonable assumptions and estimates. These may include life expectancy, inflation rates, tax rates, investment performance/returns, and other material assumptions and estimates.

b. **Select and Prioritize Goals.** Help the client select and prioritize goals. Discuss with the client any goals the client has selected that we believe are not realistic.

3. ANALYZE THE CLIENT'S CURRENT COURSE OF ACTION AND POTENTIAL ALTERNATIVE COURSE(S) OF ACTION

a. **Analyzing Current Course of Action.** Analyze the client's current course of action, including the material advantages and disadvantages of the current course, and decide whether the current course maximizes the potential for meeting the client's goals.

b. **Analyzing Other Potential Courses of Action.** Consider and analyze one or more potential alternative courses of action, including the material advantages and disadvantages of each alternative, whether each alternative helps maximize the potential for meeting the client's goals, and how each alternative integrates the relevant elements of the client's personal and financial circumstances.

4. DEVELOP THE FINANCIAL PLANNING RECOMMENDATION(S)

From the potential courses of action, we select one or more recommendations designed to maximize the potential for meeting the client's goals. The recommendation may be to continue the client's current course of action. For each recommendation selected, we consider the following information:

a. The assumptions and estimates used to develop the recommendation

b. The basis for making the recommendation, including how the recommendation is designed to maximize the potential to meet the client's goals, the anticipated material effects of the recommendation on the client's financial and personal circumstances, and how the recommendation integrates relevant elements of the client's personal and financial circumstances;

c. The timing and priority of the recommendation; and

d. Whether the recommendation is independent or must be implemented with another recommendation.

5. PRESENTING THE FINANCIAL PLANNING RECOMMENDATION(S)

We present to the client the selected recommendations and the information that was required to be considered when developing the recommendation(s).

6. IMPLEMENTING THE FINANCIAL PLANNING RECOMMENDATION(S)

a. **Addressing Implementation Responsibilities.** Establish with the client whether the advisor has implementation responsibilities. When we have implementation responsibilities, we communicate to the client the recommendation(s) being implemented and the responsibilities that we take for the client and any third party with respect to implementation.

b. **Identifying, Analyzing, and Selecting Actions, Products, and Services.** Identify and analyze actions, products, and services designed to implement the recommendations. In doing so, we consider for each selection:

   i. How the action, product, or service is designed to implement the financial advising professional's recommendation; and

   ii. The advantages and disadvantages of the action, product, or service relative to reasonably available alternatives.

c. **Recommending Actions, Products, and Services for Implementation.** A partner who has implementation responsibilities must recommend one or more actions, products and services to the client. We discuss with the client the basis for selecting an action, product, or service, the timing and priority of implementing the action, product, or service, and disclose and manage any material conflicts of Interest concerning the action, product, or service.

d. **Selecting and Implementing Actions, Products, or Services.** Help the client select and implement the actions, products, or services. The advisor discusses with the client any client selection that deviates from the actions, products, and services that are recommended.

7. MONITORING PROGRESS AND UPDATING

a. **Monitoring and Updating Responsibilities.** Establish with the client whether or not the financial advisor has monitoring and updating responsibilities. When the financial advisor has responsibilities for monitoring and updating, they must communicate to the client:

i. Actions, products, and services are and are not subject to the monitoring responsibility

ii. How and when the advisor will monitor the actions, products, and services

iii. The client's responsibility to inform of any Material changes to the client's qualitative and quantitative information

iv. The advisor's responsibility to update the financial planning recommendations; and

v. How and when the financial planning recommendations will be updated.

b. **Monitoring the Client's Progress.** An Advisor who has monitoring responsibilities must analyze, at appropriate intervals, the progress toward achieving the client's goals. They must review with the client the results of this analysis.

c. **Obtaining Current Qualitative and Quantitative Information.** Collaborate with the client in an attempt to obtain current qualitative and quantitative information concerning the client's personal and financial circumstances to update the recommendations previously given to the client.

d. **Updating Goals, Recommendations, or Implementation Decisions.** When we have responsibility to update a financial plan in terms of products or services and/or the client's situation has changed in either goals or recommendations, we do so in accordance with the standards of financial planning as set forth by the CFP Board.