

Item 1. Introduction:

Certified Advisory Corp is registered with the Securities and Exchange Commission as an Investment Adviser. Brokerage and Investment Advisory services and fees differ. It is important for a retail investor to understand these differences. Free and simple tools are available to research firms and financial professionals.

Item 2. Relationships and Services:

What investment services and advice can you provide me?

Our firm offers advice in the areas of Retirement, Income Tax, and Cash Flow Consulting, Investments, Risk Management, and Lump-Sum Distributions. We offer standalone one-time financial consulting, ongoing financial consulting as part of our investment management services, and individualized ongoing management of an investment portfolio in which we create and monitor a securities portfolio tailored to you. As part of our fiduciary obligations to you, we will consider your investment objectives, risk tolerance, time horizon, and other information you provide to us as well as any restrictions you may place on us before making a recommendation. If you choose, our firm accepts discretionary authority over your portfolio. Discretion means that we will not contact you for trade decisions and other decisions. Alternatively, if you choose non-discretionary authority, these decisions will be made by you. We offer advice across all investments, without limitation, though the majority of our advice is provided in respect to individual equities, individual fixed-income securities, mutual funds and exchange traded funds. Generally, our firm does not limit the type of investments available to you; however, if we find an investment inappropriate based on your objective(s), we can refuse the transaction. Your managed portfolios are actively monitored on an ongoing basis. We provide to you, at least quarterly, portfolio statements of your investments which include historical performance. Our minimum investment is \$500,000.00 for CAC's Investment Management Services, which can be waived in certain situations. If you open an account under our Betterment for Advisors platform, you complete an online personal risk tolerance assessment and provide additional information about your financial goals. Based on the information provided, the appropriate model portfolio is selected for you. We will regularly monitor and periodically rebalance your model portfolio based upon your goals and provide you general advice. There is no minimum account balance required.

Conversation Starters you may wish to ask your financial professional:

- **Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me?**
- **What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?**

For additional information: Please reference our *Form ADV Part 2A and 2B, investor.gov/CRS, Management Agreement and/or Financial Consulting Agreement*. For further information on fiduciary obligations, please refer to *cefex.com* and *cfp.net*.

Item 3. Fees, Costs, Conflicts and Standard of Conduct:

What fees will I pay?

We charge a fee for our investment management services as well as the Betterment for Advisors platform on a defined tier, not to exceed 1.5%, which is billed quarterly. The Betterment fee is shared between us and Betterment. The management fee is asset-based, meaning it's calculated on the amount of assets we manage for you. This means the more assets you have in your account, the more fee you pay. Therefore, we have the incentive to encourage you to increase the assets in your account(s). You will pay fees and costs whether you make or lose money on your investments and they will reduce the amount of money you make on your investments over time. Please make sure you understand what costs and fees you are paying. In managing your portfolio, there are some fees and costs which are charged by third parties. We do not charge these fees or receive any portion of them. Your custodian may charge you fees for the services they provide you. These could include transaction fees, safekeeping fees, account maintenance fees, transfer fees, fees related to mutual funds and annuities, or other fees associated with products we manage for you. We do not receive any benefit from these fees.

Our firm charges an hourly or fixed fee, based on complexity, for financial consulting services. An estimate will be determined at the start of the advisory engagement and provided to you in writing. In limited circumstances, the total could potentially exceed the estimate. In such cases, we will notify you and request that you approve the additional fee. Our firm requires 50% of the fee in advance and the remaining portion upon the completion of the services rendered.

Conversation Starters you may wish to ask your financial professional:

- **Help me understand how these fees and costs might affect my investments.**
- **If I give you \$10,000 to invest, how much will go to fees and costs and how much will be invested for me?**

For additional information: Please reference our *Form ADV Part 2A, investor.gov/CRS, Management Agreement, and/or Financial Consulting Agreement*

What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

As part of our investment advisory services to you, it is possible that we will recommend you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you do this, we will charge our management fee on those assets. This presents a conflict of interest because this could be an incentive to recommend the rollover.

Certain persons providing investment advice on behalf of our firm are also registered representatives ("RRs") of a registered broker/dealer, and member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). Although our firm's only compensation is received directly from you, an RR receives commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by these RRs is separate and could be in addition to our advisory fees. This presents a conflict of interest because persons providing investment advice on behalf of our firm who are RRs could have an incentive to effect securities transactions for the purpose of generating commissions. You are under no obligation, contractually or otherwise, to purchase securities products through any person affiliated with our firm. Your Advisor's registration status is provided in his/her Supplemental Brochure which should be provided to you.

Conversation Starters you may wish to ask your financial professional:

■ **How might your conflicts of interest affect me and how will you address them?**

For additional information: Please reference our *Form ADV Part 2A, investor.gov/CRS, Management Agreement, and/or Financial Consulting Agreement*.

How do your financial professionals make money?

Your adviser receives a percentage of the fee you pay. We do not offer a higher payout or additional incentive to advisers based on the investments they recommend. However, the percentage of the fee paid to your advisor does increase as their overall assets under management increase. The more fees an advisor earns overall, the greater the percentage he or she will be paid by the firm, but your fee percentage will not increase. Your advisor may have the incentive to encourage you to increase the assets in your account(s) because when you do better, we do better. Some advisors may also be securities registered and/or insurance licensed and earn commissions on sales of investment and/or insurance products.

Item 4: Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

Yes, we have disclosed disciplinary events; however, we do not believe they are material in your decision to do business with us. You can learn about our legal and disciplinary history at *investor.gov/CRS*, your financial advisors *ADV Form 2B* and, if your advisor is also securities registered, at *brokercheck.finra.org/* or *myfloridalicense.com/*.

Conversation Starters you may wish to ask your financial professional:

■ **As a financial professional do you have any disciplinary history? For what type of conduct?**

Item 5: Additional Information

We encourage you to visit our website at *FinancialGroup.com* for more information. You can also contact us by phone at 407.869.9800 or 800.393.9900 to obtain an up-to-date, free of charge Client Relationship Summary.

Conversation Starters you may wish to ask your financial professional:

- **Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?"**