



Form Adv Part 2A

JANUARY 21, 2021



ALIGN

FINANCIAL



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This brochure provides information about the qualifications and business practices of Align Financial, LLC. If you have any questions about the contents of this brochure, please contact us at (218) 336-2506. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Align Financial, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Align Financial, LLC is 309238.

Align Financial, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

ITEM 2: MATERIAL CHANGES

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure. Each year, we will ensure that you receive a summary of any material changes to this and subsequent brochures by April 30th. We will further provide you with our most recent brochure at any time at your request, without charge. You may request a brochure by contacting us at (218) 336-2506.

Material Changes Since Last Update

While Align Financial Financial, LLC has been providing advice since 2017, and Tanya Nichols since 2006, as DBAs of former firms, this is the firm's first Brochure filing as a state-registered investment adviser. Align Financial, LLC was established as a new Registered Investment Advisor in October 2020 under the State of Minnesota rules and regulations.



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ITEM 4: ADVISORY BUSINESS

A. Description of the Advisory Firm

Align Financial, LLC (hereinafter called "Align") is a Registered Investment Adviser based in Hermantown, Minnesota, and incorporated under the laws of the State of Minnesota. Align is owned by Tanya Nichols. Align is registered with the State of Minnesota and is subject to its rules and regulations. Align Financial, LLC was founded in March 2017 and became a Registered Investment Adviser in October 2020. Tanya Nichols has been providing financial advice to clients since 2006.

B. Types of Advisory Services

Align offers the following services to advisory clients, each designed to help you achieve your financial goals:

FINANCIAL PLANNING

Financial plans and planning services may include but are not limited to: retirement income, risk assessment/management, tax and investment planning, estate planning, financial organization, or financial decision making/negotiation. The majority of Align clients receive financial planning services in connection with investment supervisory services.

INVESTMENT SUPERVISORY SERVICES

Align provides ongoing discretionary portfolio management services based on the individual goals, objectives, time horizon and risk tolerance of each client. Align also performs investment advisory services, which may include, but are not limited to, the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, stocks, mutual funds and bonds, annuities, and/or preparing written investment strategies. Align does not allow for clients to place restrictions on the types of investments made in the account(s).

Align will require discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Any portfolio changes are then reviewed at regular review meetings which are conducted at least annually.

Align will require clients to use Fidelity Investments as the custodian. Align selected Fidelity based on their size, strength, reputation and low fees. Each year we evaluate the major custodians to ensure that Fidelity is still the best fit for our clients' needs.

SERVICES LIMITED TO SPECIFIC TYPES OF INVESTMENTS

Align uses an extensive process including industry standard software to screen some 80,000 available investment options into a short list of mutual funds, equities (stocks), bonds, fixed income, and ETFs that will best accomplish our client goals. Align may use other securities as well to help diversify a portfolio when applicable.

ADDITIONAL SERVICES

Align provides other services at no additional cost. These services include regular educational seminars, quarterly performance statements, family meetings, referrals to other professionals and other services related to comprehensive wealth management. In other words, we seek to serve as your primary point of contact for all things related to your finances.

C. Client Tailored Services

Align offers a similar suite of services to all of its clients. However, specific client portfolios and their implementation are dependent upon the clients customized financial plans which outlines each clients current situation (income, tax levels, financial goals and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches the needs and targets of the client.

Align believes that financial planning should be specifically tailored to the unique situation of each client. Prior to creating a financial plan or investment recommendations, clients must provide full disclosure of their financial situation including asset statements, tax returns, estate documents and insurance information. In addition, Align needs a thorough understanding of a clients' financial goals and concerns. Only then can Align offer recommendations on how to best achieve a client's goals.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that may include advisory fees, transaction (brokerage) costs, and other administrative fees. Align does not participate in any wrap fee programs.

E. Accounts Under Management

The firm currently does not have any assets under management.



ITEM 5: FEES AND COMPENSATION

A. Fee Schedule

INVESTMENT ADVISORY SERVICES FEES

TOTAL ACCOUNT VALUE	MAX ANNUAL FEE
Under \$500,000	1.65%
\$500,000 – \$1,000,000	1.50%
\$1,000,001 – \$2,000,000	1.00%
\$2,000,001 – \$3,000,000	0.90%
\$3,000,001 – \$5,000,000	0.85%
\$5,000,001 or more	0.75%

B. Payment of Investment Advisory Fees

Advisory fees are withdrawn directly from the client's accounts by the custodian (Fidelity) with client written authorization. Fees are charged quarterly, in advance based on the value of their accounts as of the last business day of the quarter. Clients will receive a monthly custodial statement which includes the amount of any fees paid to Align for advisory services. You should carefully review the statement from your custodian/broker-dealer's statement and verify the calculation of fees. Your custodian/broker-dealer does not verify the accuracy of fee calculations. Align also sends a quarterly fee statement to every client that illustrates the calculation of the advisory fee.

C. Third Party Fees

The client is responsible for any fees and charges incurred by the client from third parties as a result of maintaining the account such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Clients should ask Align for details on transaction fees or other custodial fees specific to their account, as these fees are not included in the annual advisory fee. Align does not share any portion of such fees.

Additionally, for any mutual funds purchased, the client may pay their proportionate share of the funds' distribution, internal management, investment advisory and administrative fees. Such fees are not shared with Align and are compensation to the fund manager. Clients are urged to read the mutual fund prospectus prior to investing.



D. Financial Planning

The majority of Align clients receive financial planning services in connection with investment supervisory services, however there is not an extra fee associated with these services.

E. Additional Fees and Expenses

Mutual funds purchased or sold in broker-dealer accounts may generate transaction fees that would not exist if the purchase or sale were made directly with the mutual fund company. Clients may purchase shares of mutual funds directly from the mutual fund issuer, its principal underwriter, or a distributor without purchasing the services of Align or paying the advisory fee on such shares (but subject to any applicable sales charges).

Certain mutual funds are offered to the public without a sales charge. In the case of mutual funds offered with a sales charge, the prevailing sales charge (as described in the mutual fund prospectus) may be more or less than the applicable advisory fee. However, clients would not receive Align's assistance in developing an investment strategy, selecting securities, monitoring performance of the account, and making changes as necessary.

F. Outside Compensation for the Sale of Securities

Neither Align, nor Tanya Nichols receive any outside compensation for the sale of securities to client. Please refer to Item 12 "Brokerage Practices" of this brochure for additional information.



ITEM 6: PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

Align Financial, LLC does not charge performance-based fees or participate in side-by-side management. Our fees are calculated as described in Fees and Compensation section above and are not charged on the basis of performance of your advisory account.

Side-by-Side Management Fees - refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

Performance-Based Fees - are fees that are based on a share of capital gains or appreciation of the assets of a client.

ITEM 7: TYPES OF CLIENTS

Align generally offers financial planning and investment advisory services to individuals and high net worth individuals.

Minimum Account Size

The services of Align are best suited to the unique needs of clients whose nest egg exceeds \$500,000. This minimum may be waived by the investment adviser, based on the needs of the client and the complexity of the situation.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, & RISK OF LOSS

A. Methods of Analysis and Investment Strategies

METHODS OF ANALYSIS

There are currently some 80,000 different investment options available to individual investors. Align utilizes a number of strategies to identify only those investments that give our clients the highest probability of achieving their financial goals. The strategies employed by Align include fundamental analysis, technical analysis, and cyclical analysis. These methods of analysis are used as part of a long-term, buy and hold strategy based on academic research and historical evidence.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Cyclical analysis involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

INVESTMENT STRATEGIES

Align uses long term trading and short term trading.

It is important to remember that ALL investments involve a risk of loss. Securities (stocks, bonds, mutual funds, ETFs) can experience substantial losses. Historically speaking, in a well-diversified portfolio, these losses can exceed 20% in any given year.

These losses have historically been temporary, but past performance is no guarantee of future results.

B. Material Risks Involved

No investment is free of risks. Current and prospective Align Financial clients are cautioned that investments in securities involve risk of loss, including the possibility of a complete loss of the amount invested. All investors should be prepared to bear these risks. One of Align Financial's top priorities is to make sure clients understand the investment risks they choose to take and help them select investment strategies that are appropriate for their risk tolerance.

Investors should note that all Align portfolios invest all or a substantial portion of assets in mutual funds and ETFs. Investors are urged to consult the prospectus or other offering documents of each such mutual fund or ETF for additional risks and other considerations.

METHODS OF ANALYSIS

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

INVESTMENT STRATEGIES

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can negatively affect investment performance, particularly through increased brokerage and other transaction costs and taxes. As such Align seeks to minimize the number of trades in client accounts.

Short term trading generally holds greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

Align goes to great lengths to reduce the risk of loss in client accounts. However, investing in securities always involves a risk of loss that you, as a client, should be prepared to bear.



C. Risks of Specific Securities Utilized

Align generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

Mutual Funds: Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature (explained below).

Equity investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Treasury Inflation Protected/Inflation Linked Bonds: The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

Fixed Income is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

Debt securities carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

Stocks and Exchange Traded Funds (ETF): Investing in stocks and ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability and inflation.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

ITEM 9: DISCIPLINARY INFORMATION

Align Financial, LLC or its Principal Executive Officers have not had any reportable disclosable events in the past ten years.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Tanya Nichols, owner and sole IAR of Align, is not currently registered with any broker dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Align nor its representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interest

Tanya Nichols is a licensed insurance agent. Not more than 10% of her time is spent on these activities. From time to time, she offers clients advice or products from those activities. She may receive separate yet typical compensation in the form of commissions for the sale of insurance products.

Clients should be aware these practices represent a conflict of interest because it gives Tanya an incentive to recommend products based on the commission amount received. Align Financial has a fiduciary responsibility to act in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through Align Financial in such individual's capacity as a licensed insurance agent and have the option to purchase these products through another insurance agent of their choosing.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. Code of Ethics

While the "golden rule" should suffice, we also have a written Code of Ethics which includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect client interests at all times and to demonstrate our commitment to fiduciary duties of honesty, good faith, and fair dealing. All of Align's Associated Persons are expected to strictly adhere to these guidelines. Persons associated with Align Financial, LLC are also required to report any violations to the Code of Ethics. Additionally, the firm takes privacy seriously and maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about our clients or client accounts by persons associated with our firm.

B. Investing Personal Money in the Same Securities as Clients

Because we "eat our own cooking" Align and its employees may buy or sell securities that are also recommended for clients. It is the expressed policy of the advisor that no person employed by our firm purchase or sell any security prior to the transaction being implemented for an advisory account; therefore, preventing such employees from benefiting from transactions placed on behalf of the advisory clients.

C. Recommendations Involving Material Financial Interests

The advisor does not have, nor plans to have, an interest or position in a security which is then also recommended to the client. As these situations may present a conflict of interest, the advisor has established the following restrictions in order to ensure its fiduciary responsibilities should this issue ever arise:

1. A director, officer or employee of the advisor shall not buy or sell a security for their personal portfolio(s) where their decision is substantially derived, in whole or part, by reason of his or her employment, unless the information is also available to the investing public. No owner/employee of Align shall prefer their own interest to that of the client.
2. The advisor maintains a list of all securities held by the company and all directors, officers, and employees. These holdings are reviewed on a quarterly basis by the principal of the firm.
3. The advisor requires that all employees must act in accordance with all applicable Federal and State regulations governing registered investment advisors.
4. The advisor may block personal trades with those of clients but will ensure that clients are not at a disadvantage.

Align's Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting Tanya Nichols at (218) 336-2506.

ITEM 12: BROKERAGE PRACTICES

A. Factors Used to Select Custodians and/or Broker/Dealers

The Custodian, Fidelity Investments ("Fidelity"), was chosen based on their relatively low transaction fees, customer service, transparency, financial strength, reputation, reporting capabilities, types and quality of research and access to a broad selection of investment options. While Align makes every attempt to minimize extra transaction costs, Fidelity may charge their own trade fees related to transactions. The client may incur account maintenance and/or money movement charges directly from Fidelity. Align and Fidelity are not affiliated companies.

1. RESEARCH AND OTHER SOFT-DOLLAR BENEFITS

Align receives research, products or other services from its custodian Fidelity in connection with client securities transactions. These soft-dollar benefits are consistent with industry standard practices. There is no minimum client number or dollar number that Align must meet in order to receive the free research from the custodian or broker/dealer.

There is no incentive for Align to direct clients to this particular broker-dealer over other broker-dealers who offer the same services. However, because this firm does not have to produce or pay for certain services or products it has an incentive to choose a custodian that provides those services based on its interest rather than the clients' interest. Align does not have any formal soft dollar arrangements.

2. BROKERAGE FOR CLIENT REFERRALS

Align does not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

3. CLIENTS DIRECTING WHICH BROKER/DEALER/CUSTODIAN TO USE

Align will require clients to use a specific broker/dealer to execute transactions.

B. Aggregating (Block) Trading for Multiple Client Accounts

Align maintains the ability to block trade purchases across accounts. Because Fidelity does not discount trade fees from block trading, the decision to block trade (or not) has no impact on fees paid by clients. This means when Align buys or sells the same security for two or more clients (including our personal accounts), we may place concurrent orders to be executed together as a single "block" in order to facilitate orderly and efficient execution. Each client account will be charged or credited with the average price per unit.

We receive no additional compensation or remuneration of any kind because we aggregate client transactions. No client is favored over any other client. If an order is not completely filled, it is allocated pro-rata based on an allocation statement prepared by Align prior to placing the order. Because of an order's aggregation, some clients may pay higher transaction costs, or greater spreads, or receive less favorable net prices on transactions than would otherwise be the case if the order had not been aggregated.

ITEM 13: REVIEW OF ACCOUNTS

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed at least quarterly by Tanya Nichols, With the assistance of various software programs. Tanya reviews clients' accounts with regards to their investment policies, financial goals and risk tolerance levels. All accounts at Align are assigned to this reviewer.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance) or simply at a client's request.

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least monthly, from the custodian (Fidelity) a written or electronic report that details the clients' account including assets held and assets value which will come directly from the custodian. By receiving statements directly from Fidelity clients are able to more closely monitor their accounts.

Each client will also receive at least quarterly an invoice from Align that details all asset management fees charged to the clients' account by Align. Clients are encouraged to review these statements to verify accuracy and calculation correctness.

In addition, Align will send performance reports on a frequency determined by the relationship with each client. These reports are designed to clearly illustrate the long-term performance of client accounts.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

Align does not compensate any individual or firm for client referrals. In addition, Align does not receive compensation for referring clients to other professional service providers.

ITEM 15: CUSTODY

Align does not have physical custody of any client funds and/or securities and does not take custody of client accounts at any time. Client funds and securities will be held with a bank, broker dealer, or other independent qualified custodian. However, by granting Align written authorization to automatically deduct fees from client accounts, Align is deemed to have limited custody.

You will receive account statements from the independent, qualified custodian holding your funds at least quarterly. The account statement from your custodian will indicate the amount of advisory fees deducted from your account(s) each billing cycle. Clients should carefully review statements received from the custodian. Align also sends quarterly invoices detailing the manner and amount of advisory fees to all clients.

ITEM 16: INVESTMENT DISCRETION

Please refer to the "Advisory Business" section of this Brochure for more information on our discretionary management services.

For those client accounts where Align provides ongoing supervision, the client has given Align written discretionary authority over the client's accounts with respect to the securities to be bought or sold and the amount of the securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides Align discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

ITEM 17: VOTING CLIENT SECURITIES

We do not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

ITEM 18: FINANCIAL INFORMATION

Align does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

ITEM 19: REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Principal Executive Officers and Management Persons Education and Business Background:

Tanya Nichols, CFP®, CDFP®
Managing Principal and CCO

Business Background

Align Financial, LLC, Managing Principal/CCO, September 2020 – Present

Raymond James Financial Services, Inc. DBA Align Financial, LLC, Financial Advisor,
September 2014 – September 2020

Raymond James Financial Services Advisors, Inc., Investment Advisor Representative,
September 2014 – September 2020

Ascential Wealth Advisors, Financial Advisor, September 2014 – April 2017

Wells Fargo Advisors, Financial Advisor, December 2010 – September 2014

US Bancorp, Financial Advisor, March 2006 – December 2010

US Bancorp Piper Jaffray, Registered Investment Assistant, August 1999 – March 2006

Educational Background

University of Minnesota Duluth, School of Business, Bachelor of Finance, Graduated: 2006

Relevant Designations

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial advisors to hold the certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

Education: Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Boards studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a bachelor's degree (or higher), or its equivalent, in any discipline, from an accredited college or university.

This program is sponsored by the CFP Board of Standards. Before applying for the CFP® Certification Examination, you need to meet the six course education requirements (or their equivalent) as set by CFP Board as well as a financial plan development course registered with CFP Board. CFP Board's financial planning six subject areas are insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning and estate planning.

Examination: Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two day period, include case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

Experience: Complete at least three years of full-time financial planning related experience (or the equivalent, measured as 2,000 hours per year); and

Ethics: Agree to be bound by CFP Board's Code of Ethics and Professional Responsibility, Rules of Conduct and Financial Planning Practice Standards which outlines the ethical and practice standards for CFP® professionals. Candidates must also pass Fitness Standards and a Background Check.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- i. **Continuing Education:** Complete 30 hours of continuing education every two years, including a two hour CFP Ethics course. For more details, see www.cfp.net.
- ii. **Ethics:** Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

CERTIFIED DIVORCE FINANCIAL ANALYST (CDFA®)

This program applies the discipline of financial planning to settlement strategies in divorce. The process requires the synthesis of tax, insurance, retirement, and other areas of knowledge with their specific application to divorce. The eligibility requirements for the program were established by the Institute for Divorce Financial Analysis (IDFA) Board of Advisors and reflect the fact that this is not an entry-level designation but an advanced program.

Individuals with a minimum of three years of professional experience in finance or divorce and a bachelor's degree are eligible to enroll in the CDFA® Program. IDFA will accept ten years of professional experience from those candidates that do not have a bachelor's degree. This includes experience as a financial professional, accountant, or matrimonial lawyer.

None of the Principal Executive Officers and Management persons listed have had any complaints or any events required to be disclosed in this section.

Neither Align Financial, LLC nor any of its Management persons have any relationships or arrangements with any issuers of securities.

PART 2B SUPPLEMENTS

Succession Agreement

As a fiduciary, Align Financial, has certain legal obligation, including the obligation to act in clients' best interest. Align maintains a Business Continuity and Succession Plan and seeks to avoid a disruption of service to clients in the event of an unforeseen loss of key personnel, due to disability or death. To that end, Align, has entered into a succession agreement with The Wealth Group, effective 2018. Align can provide additional information to any current or prospective client upon request to Tanya Nichols at 218-336-2506 or tanya@align.financial

Fiduciary Oath

We believe in placing your best interests first. Therefore, we are proud to commit to the following five fiduciary principles: We will always put your best interests first. We will act with prudence; that is, with the skill, care, diligence, and good judgment of a professional. We will not mislead you, and we will provide conspicuous, full and fair disclosure of all important facts. We will avoid conflicts of interest. We will fully disclose and fairly manage, in your favor, any unavoidable conflicts.

Privacy Policy

At Align Financial, LLC, we do everything we can to provide our clients with peace of mind. We have adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We know you have entrusted us with your personal information and we are committed to safeguarding that personal information.

CATEGORIES OF INFORMATION WE COLLECT

We collect certain nonpublic personal identifying information about you (such as your name, address, social security number, etc.) from information that you provide on applications or other forms as well as communications (electronic, telephone, written, or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

CATEGORIES OF INFORMATION WE DISCLOSE

We do not sell, share or disclose your nonpublic personal information to non-affiliated third-party financial companies. We will not disclose the nonpublic personal information we collect about our customers to anyone except as necessary as follows: (i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers, etc.); (ii) to persons assessing our compliance with industry standards (e.g. professional licensing authorities, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing on our behalf or for joint marketing programs), however **we will not do so**. These third parties are prohibited to use or share the information for any other purpose. If you decide at some point to either terminate our services, or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

CONFIDENTIALITY AND SECURITY OF YOUR INFORMATION

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information. These safeguards are reasonably designed to:

- Ensure the security and confidentiality of customer records and information;
- Protect against unauthorized access to or use of customer records or information that could result in substantial harm or inconvenience to any customer.

CHANGES TO OUR PRIVACY POLICY OR RELATIONSHIP WITH YOU

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change to this policy before we implement the change.

If you have any questions or concerns with this notice, or would like to discuss your right to opt out of information sharing, please feel free to contact our office at 218-336-2506.





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