

Item 1: Cover Page



Financially in Tune, LLC

A Massachusetts Registered Investment Adviser

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Form ADV Part 2
February 25, 2016

This brochure provides clients and prospective clients with information about Financially in Tune, LLC and the qualifications, business practices, and nature of its services that should be carefully considered before becoming an advisory client. The contents of this brochure have not been approved or verified by the Securities and Exchange Commission (SEC) or any other state or federal authority. While the firm is an investment adviser registered with the Commonwealth of Massachusetts, registration alone does not imply a certain level of skill or training on the part of the firm or its associated personnel.

Important Information: Throughout this document, Financially In Tune, LLC shall also be referred to as the "firm," "our," "we" or "us." These terms are utilized for the reader's ease of use while reviewing the brochure and are not meant to imply the firm is larger than it actually may be at the time of publication. The client or prospective client may also be referred to as "you," "your," etc., and refers to a client engagement involving a single *person* as well as two or more *persons*.

Item 2 – Material Changes

Since the firm’s previous ADV Part 2 Brochure dated March 23, 2015, Financially in Tune has updated its disclosures relating to the firm’s assets under management; please see **Item 4 – Advisory Business** for details.

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This Brochure contains 19 pages and should not be considered complete without all pages.

Item 4 – Advisory Business

The “Fee-Only” Difference

Financially in Tune is a Massachusetts registered investment adviser that provides portfolio management, financial planning and investment consulting services on a **fee-only** basis. “Fee-only” means that we do not sell any financial products; we sell only our advice and services. This is different than a “fee-based” adviser in that we do not receive any commissions or referral fees. We provide these fee-only services to individuals, trusts, estates, charitable organizations, and corporations or other business entities.

The Fiduciary Standard

Financially in Tune holds itself to a *fiduciary standard*, which means the firm and its associates will act in the utmost good faith and perform in a manner believed to be in the best interest of its clients. As investment advisers we are legally required to put you, the client, first. This sets us apart from investment brokers, who are held to a lower “suitability” standard and are not legally required to place clients’ interests ahead of their own, or to disclose their conflicts of interest involving their clients’ transactions.

Firm Services

Financially in Tune offers the following types of services to its clients:

Financial Planning and Investment Consultation Services

You may choose to engage Financially in Tune for hourly, as-needed financial planning and investment consultation services that do not involve the management of your portfolio. Under this type of agreement, we would be engaged exclusively to provide you with incidental financial planning and investment advice, and you could implement the plan and/or advice independently or through another adviser.

Financial planning and investment consultation services are often broad based – looking at a client’s overall financial situation, needs and objectives, and developing a financial plan that is expansive in scope. Sometimes, however, a client prefers to focus only on certain aspects of their financial situation, rather than on his or her overall financial circumstances and long-term goals. Working within these limitations means that we may not be able to address other important aspects of a client’s overall financial situation.

Portfolio Management Services

Also called “investment management” or “investment supervisory” services, portfolio management involves Financially in Tune actively managing a client’s account or accounts. We provide this service under both discretionary and non-discretionary account agreements.

Client Assets Under Management

As of December 31, 2015, our firm had approximately \$35.06 million¹ dollars of client assets under management: \$35.05 million dollars through discretionary account agreements, and \$10,500 dollars through non-discretionary account agreements (as defined in Item 16).

¹The term “assets under management” and rounding to the nearest \$100,000 are as defined by the SEC’s 2014 General Instructions for Part 2 of Form ADV.

Non-Securities Advice

Financially in Tune also provides hourly, as needed advice to clients on non-securities matters, including but not limited to:

- cash flow management,
- risk management (i.e., different types of insurance),
- tax strategies
- retirement and education funding,
- debt reduction,
- investment analysis,
- asset allocation and selection, and
- estate planning.

Introductory Meeting

Our process begins with a complimentary “get acquainted” meeting. During this meeting, we gain an understanding of your personal goals, your financial needs and objectives, and any areas of concern; this information helps us determine the scope of services to be provided. During or prior to this initial meeting, a current ADV Part 2 Brochure, which includes the firm’s Privacy Policy, will be delivered. At the end of the meeting, you will be provided with a fee estimate based upon the proposed scope of services, as well as a list of additional materials needed to continue with your plan.

The Financial Planning Process

Should you wish to engage Financially in Tune for its services, you and the firm must execute a written client agreement. Once a client agreement is in effect, further discussion takes place to obtain additional information and clarification on your financial needs, goals, current holdings, and other information needed for the firm to analyze your situation and offer advice and planning. Financial advice and/or plans are based upon the information you or your legal agent provide, and reflect your financial situation at the time the plan is presented. In performing its services the firm may, but is not required to, verify any information received from you or from your legal agents.

Financially in Tune does not provide legal, accounting, or property and casualty insurance services. With your permission, however, we may work together with your accountant, attorney or other professional advisers to coordinate and implement the strategies we have agreed on. You should be aware that these other professional advisers will bill you separately for their services, and their fees will be in addition to those of Financially in Tune.

Engagements involving financial planning and investment consultation services generally conclude upon delivery of advice or the plan. We encourage our clients to engage the firm in the future, however. In order to stay on track with your goals, it is important to schedule periodic updates; it is each client's responsibility to initiate these meetings. Unless a written agreement is already in place between the firm and the client that specifically includes review and updates (such as a portfolio management agreement), it is the client's responsibility to initiate additional services. The firm is not obligated to monitor the accounts of incidental services clients or otherwise provide future services unless the client specifically requests such services and the firm agrees. Such services may be offered under a new or amended agreement.

We typically utilize a long term investment perspective, unless a client specifically requests to the contrary. If you engage us for services, Financially in Tune may assist you in developing a portfolio deemed appropriate given your particular investment objectives and tolerance for risk.

Educational Workshops

Financially in Tune may provide educational workshops on an “as announced” basis for groups desiring general advice on investments and personal finance.

We offer customized presentations to meet the needs of employees or other groups, including on issues related to wealth management, financial planning, retirement strategies, or various other economic and investment topics.

Educational workshops or programs we conduct are purely educational in nature and do not involve the sale of any investment products. The information presented at these events is not based on any individual person’s need, and we do not provide individualized investment advice to attendees during these sessions.

Limitations of Liability

While Financially in Tune uses its best judgment and good faith effort in rendering its services to its clients, we cannot guarantee any particular level of account performance, or that any account or any individual investment will be profitable over time. With all investments, past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, the firm will not be liable to the client, heirs, or assigns for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by the firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from the firm's adherence to the client or their legal agent's direction; or any act or failure to act by a service provider maintaining an account.

Notwithstanding the preceding, nothing within the client services agreement or this Brochure is intended to diminish the firm's fiduciary obligation to act in the client's best interest, or shall in any way limit or waive any rights that clients have under federal or state securities laws or the rules promulgated pursuant to those laws.

Item 5 – Fees and Compensation

Fees for Financial Planning and Investment Consultation Services

Due to the unique situation of each client, our planning and consultation services are generally provided on an hourly or fixed fee basis, calculated based on the firm's current rate of \$250 per hour. Hourly engagements are billed in 15-minute increments, and a partial increment is treated as a whole. The services to be provided and the total estimated fee to be charged will be determined on a case-by-case basis, and detailed in the client agreement.

Financially in Tune may require a deposit for initial engagements in an amount not to exceed \$1,200, or ½ of the lower end of the estimated fee range, whichever is less. Any fees or project balances for financial planning and investment consultation services are due and payable upon delivery of the plan or advice. Projects spanning more than three months will be billed quarterly, in advance.

Fees for Portfolio Management Services

Fees for portfolio management services will be quoted individually based on the complexity of the client's situation, client's net worth, assets under management, and other factors. The fee to be charged will be clearly stated in the client agreement. Fees are charged quarterly, in advance.

Our fee is a retainer fixed fee. It is not based solely on the amount of Assets Under Management (AUM) which is the common method for advisor compensation. This better allows the advisor to avoid potential conflicts that could arise if a recommendation, for example to pay off a mortgage, would result in lower assets under management. Our fee is based on your net worth as well as the complexity of your situation.

Fee changes will occur when the client circumstances change. Fees will remain the same each quarter unless a new written agreement is executed. For reference, our annual fees will not exceed the ranges in the following table:

Assets Under Management	Annual Fee
Less than \$100,000	\$1,000 (fixed)
\$100,000 - \$1,000,000	1% - 1.5%
\$1,000,001 - \$3,000,000	.75% - 1%
Over \$3,000,000	Negotiated individually

Fees are negotiable at the discretion of Financially in Tune. We reserve the right to waive or reduce certain of our fees based on unique individual circumstances, special arrangements, pre-existing relationships or as otherwise determined by the firm principal.

Fees for Educational Workshops

Financially in Tune may conduct group educational workshops for which we may impose a fee. In most cases, the employer, civic or non-profit group sponsoring the workshop pays any such fee, and the individual attendees are not charged. Typically, the fee is a fixed amount due at the time of the session. In the event that workshop attendees would be required to pay a fee, the amount of the fee would be clearly disclosed in the event's announcement and/or invitation.

Recommendations, Including No-Load Products

Our investment approach is based on the employment of "no load" mutual funds and exchange traded funds (ETFs) – in other words, those for which you would not be charged a sales commission. In some cases, however, such as with certain insurance products, there may not be a suitable selection of no-load products available for recommendation. We also may be limited by the investment choices available in your 401(k) or other retirement plan. In any case, neither the firm nor its associates will be paid a commission on your purchase of an insurance or investment product.

The products we recommend do involve charges of their own, however. The fees clients pay to Financially in Tune for our services are completely separate and distinct from any charges that clients may pay for mutual funds, exchange-traded funds (ETFs), exchange-traded notes (ETNs), or other similar investments.

Financially in Tune does not receive “trailer” or 12b-1 fees from any investment company recommended. Some custodians also may charge transaction fees —\$50 per trade, for example— and Financially in Tune receives no part of these fees.

Fees charged by any of these companies are detailed in prospectuses or product descriptions provided to the client. Clients are encouraged to read and consider these documents carefully before investing.

Termination of Services

If you enter into an agreement with Financially in Tune, either party may terminate the agreement at any time. Termination will typically be in writing. If, however, a client verbally notifies Financially in Tune of termination and, we do not receive a written termination notice from the client within two business days, Financially in Tune will document the client’s instructions to terminate the relationship in our records, and will send a written termination notice to the client. The firm is not responsible for future allocation recommendations or advice upon termination notice.

A client may terminate an agreement with the firm without penalty or charge within five business days after the signing of the client services agreement. For terminations that occur after the first five days following signing of the client services agreement, a *pro rata* portion of any prepaid, unearned fees will be promptly returned to the client following receipt of termination notice.

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

The firm’s portfolio management fees will not be based upon a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as “performance-based fees.” Financially in Tune does not use a performance-based fee structure because of the potential conflict of interest this type of fee structure may pose. Performance-based compensation may create an incentive for an adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7 – Types of Clients

Financially in Tune provides services to help individual investors, trusts, estates, charitable organizations, and businesses address their financial objectives in a cost-effective way. Our clients include single investors, families, retirees, professionals, executives and small business owners. We do not require minimum income levels, a minimum level of assets, or other conditions for our portfolio management or financial planning and investment consultation services.

Our ability to provide the best service and advice depends on access to information. Accordingly, our clients are expected to provide an adequate level of information and supporting documentation throughout the term of the engagement, including but not limited to: source of funds; income levels; and the client’s (or legal agent’s) authority to act on behalf of the account; among other information. This information helps us determine the appropriateness of our financial planning and/or investment strategy for the client or account.

It is very important that our clients keep us up-to-date on significant changes in their lives that may call for an update to their financial plan. Events such as job changes, a child receiving a scholarship, a marriage or divorce, or the purchase or sale of a home can have a tremendous impact on a client’s circumstances and needs. If we are aware of such events, we can make the adjustments needed to your plan or advice in order to keep you on track toward your goals.

Financially in Tune reserves the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, pre-existing relationships or as otherwise may be determined by a firm principal. We also reserve the right to decline services to any prospective client for any reason.

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

Methods of Analysis

If Financially in Tune is engaged to provide services, we will first evaluate several factors, including:

- your current financial situation,
- your current and long-term needs,
- your investment goals and objectives, and
- your tolerance for risk.

We make asset allocation and investment policy decisions based on these and other factors. We will then discuss with you how, in our best judgment, to meet your objectives while at the same time seeking a prudent level of risk exposure. To achieve this, we typically employ fundamental analyses to develop long-term investment strategies.

Recommendations we provide to you are based on publicly available reports, analysis and research materials, computerized asset allocation modeling programs, and various industry subscription services.

Our research may be drawn from sources that include financial publications; investment analysis and reporting software; research materials from outside sources; corporate rating services; annual reports, prospectuses and other regulatory filings; and company press releases.

Investment Strategies

Financially in Tune's asset allocation and investment policy decisions are made, in our best judgment, to help the client achieve their overall financial objectives while moderating risk exposure. The firm believes asset allocation is a key component of investment portfolio design. We believe that the appropriate allocation of assets across diverse investment categories (stock vs. bond, foreign vs. domestic, large cap vs. small cap, etc.) is the primary determinant of portfolio returns and critical in the long-term success of its financial objectives. Such portfolios seek to reduce overall risk while increasing the potential for higher returns.

Our investment philosophy is implemented by investing in open-ended mutual funds and exchange traded funds. When possible, low-cost index funds are used. Funds are selected based on their historical return and risk characteristics, costs, correlations to other asset classes, valuations, and current economic and market conditions.

If you have an existing portfolio at the time you engage us, we will evaluate your existing holdings and determine whether it is appropriate to continue to hold some or all of them, based on your objectives and needs. We will also assist in rebalancing your portfolio in order to maintain your desired allocation while minimizing your tax exposures, trading costs, etc. For hourly clients, we provide recommendations to rebalance the portfolio; for portfolio management clients, we implement such rebalancing directly.

The portfolios we recommend may include a broad range of mutual fund positions, ETFs, ETNs, individual securities, derivatives, and non-correlating asset classes. Although not an all-inclusive list, “individual securities” may include:

- common or preferred stocks,
- bond debentures,
- U.S. Government issues,
- notes,
- commercial paper,
- collateralized mortgage options (CMOs),
- Section 529 plans, and
- listed real estate investment trusts (REITs).

The term “derivatives” typically refer to options, futures and swaps that may be used to hedge risk or to exchange a floating rate of return for fixed rate of return.

“Non-correlating assets” recommended by the firm are generally in the form of open-ended mutual funds that may be used to further diversify your portfolio. Non-correlating assets that we may recommend may include commodities, managed futures, real estate and other mutual funds that incorporate investment strategies and techniques to lower correlation with traditional equity and fixed income asset classes. Non-correlating assets typically have different risk and return characteristics than traditional market securities and provide the opportunity for improved diversification than for a portfolio consisting primarily of stock and bond investments. Your existing and future portfolio allocations, including mutual funds or ETFs/ETNs, may include some or all of these types of securities.

In very limited circumstances, we may use a shorter-term investment strategy when requested by the client or in unusual market conditions.

Risk of Loss

While Financially in Tune believes our strategies and investment recommendation are designed to potentially produce the highest possible return for a given level of risk, we cannot guarantee that an investment objective or planning goal will be achieved.

Some investment decisions made by the client based on recommendations by the firm may result in loss, including potential loss of the original principal invested. Each client must be able to bear the various risks involved in the investment of account assets, which may include market, currency, interest rate, liquidity, operational or political risk, among others.

When the firm’s research and analyses is based upon commercially available software, rating services, general market and financial information, or due diligence reviews, we are relying upon the accuracy and validity of the information or capabilities being provided by selected vendors, rating services, market data, and the issuers themselves.

Financially in Tune makes reasonable effort to determine the accuracy of the information received, but it cannot predict events, actions taken or not taken, or the validity of all information it has researched or provided which may or may not affect the advice to or investment strategy of a client account or financial plan.

An investor should consider the potential risk that their broader allocation may generate lower returns than those of a specific asset, and that the risk on each type of asset is a deviation from the average return from the asset class. The firm believes this variance from the “expected return” is generally low under normal market conditions if the portfolio is made up of diverse, non-correlated assets.

Investment vehicles such as ETFs have the potential to be affected by “active risk” or “tracking error risk,” which might be defined as a deviation from their stated benchmark (index). Further, while many ETFs/ETNs are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are certain asset classes or holding periods within an ETF/ ETN that may not benefit. Shorter holding periods as well as certain commodities and currencies may be considered “non-qualified” under certain tax code provisions; therefore, the holding’s QDI will be considered if tax-efficiency is an important aspect of the portfolio.

Item 9 – Disciplinary Information

Neither Financially in Tune nor any of its associated personnel has been the subject of a reportable legal or disciplinary event pursuant the Investment Advisers Act of 1940 (as amended) or similar state statute.

Item 10 – Other Financial Industry Activities and Affiliations

Financially in Tune’s policies require the firm and its personnel to conduct business activities in a manner that avoids actual or potential conflicts of interest between the firm, employees and clients, or that may be contrary to law. Financially in Tune will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest which might reasonably compromise its impartiality or independence.

Neither Financially in Tune nor its associated persons are affiliated with nor maintain a material relationship or arrangement with another financial services industry entity, such as a broker/dealer.

Financially in Tune is a member of the Garrett Planning Network (Garrett), an organization that assists financial planners in fee-only financial planning practices. Garrett is not a registered financial industry participant, nor do its activities require it to be. Financially in Tune pays an annual membership fee to Garrett for extensive services that include training, compliance and operational support to enhance our ability to provide quality service and advice to our clients.

Investment adviser representatives of the firm may also hold individual memberships or serve on boards or committees of professional industry associations or organizations such as the National Association of Personal Financial Advisors (NAPFA), the Financial Planning Association (FPA) or the Certified Financial Planner Board of Standards, Inc. Generally, participation in these entities requires membership fees to be paid, adherence to ethical guidelines, and meeting experiential and educational requirements.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

The firm has adopted a Code of Ethics that establishes policies of ethical conduct for all personnel. Financially in Tune accepts the obligation not only to comply with all applicable laws and regulations, but also to act in an ethical and professionally responsible manner in all professional services and activities.

The firm's policies include prohibitions against insider trading, circulation of industry rumor, certain political contributions, among others.

CFP® designees, including Jeanne Gibson Sullivan, also adhere to the Certified Financial Planner Board of Standards Code of Ethics. These principles include:

Principle 1 – Integrity

An adviser will provide professional services with integrity. Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Advisers are placed by clients in positions of trust by clients, and the ultimate source of that trust is the adviser's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion; but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 – Objectivity

An adviser will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an adviser functions, an adviser should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

Principle 3 – Competence

Advisers will maintain the necessary knowledge and skill to provide professional services competently.

Competence means attaining and maintaining an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Advisers make a continuing commitment to learning and professional improvement.

Principle 4 – Fairness

Advisers will be fair and reasonable in all professional relationships. Fairness requires impartiality, intellectual honesty and disclosure of material conflict(s) of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

Principle 5 – Confidentiality

Advisers will protect the confidentiality of all client information. Confidentiality means ensuring that information is accessible only to those authorized to have access.

A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 – Professionalism

Advisers will act in a manner that demonstrates exemplary professional conduct. Professionalism requires behaving with dignity and courtesy to all who use their services, fellow professionals, and those in related professions. Advisers cooperate with fellow advisers to enhance and maintain the profession's public image and improve the quality of services.

Principle 7 – Diligence

Advisers will provide professional services diligently. Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

Due to the nature and scale of Financially in Tune, not all organizational duties are segregated; however, we employ policies and procedures to ensure timely recordkeeping and supervision. We may outsource certain functions to assist in these efforts when necessary.

Financially in Tune periodically reviews and amends our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually.

Financially in Tune will provide of copy of its Code of Ethics to any client or prospective client upon request.

Privacy Policy

Financially in Tune collects non-public personal financial information about its clients from the following sources:

- Information clients or their legal agent provide to complete their financial plan;
- Information clients provide in agreements, account applications, and other documents completed in connection with opening and maintenance of accounts;
- Information clients provide orally; and
- Information received from third parties, such as brokerage firms or custodians, about client transactions.

The firm does not disclose non-public personal information about clients to anyone, except in the following circumstances:

- When required to provide services clients have requested;
- When clients specifically authorize Financially in Tune to do so in writing; or
- When permitted or required by law.

To ensure security and confidentiality, the firm maintains physical, electronic, and procedural safeguards to protect the privacy of its clients.

Identifiable information about the client or prospective client will be maintained during the span of the engagement and for the period thereafter as required by both securities industry and state privacy laws. After that time, information will be destroyed under the firm's records destruction guidelines.

The firm will notify its clients annually of its privacy policy and at any time, in advance, if its privacy policy is expected to change.

Participation or Interest in Client Transactions

Neither Financially in Tune nor any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which the firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

Additionally, employees are prohibited from borrowing from or lending to a client unless the client is an approved financial institution, or in the case of a natural person, an immediate family member.

Personal Trading

Financially in Tune and its related persons may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. At no time will Financially in Tune or any related party receive preferential treatment over its clients.

In an effort to reduce or eliminate certain conflicts of interest involving personal trading, firm policy may require the periodic utilization of published lists that restrict or prohibit transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in any related person's account. The firm maintains the required personal securities transaction records per regulation.

Item 12 – Brokerage Practices

Financially in Tune is not affiliated with and does not maintain an ongoing agreement with a "service provider" such as a bank, custodian, or broker-dealer firm. When engaged to provide investment consultation services, we will first recommend the service provider with whom the client's assets are currently maintained. Should a client prefer a new service provider, our recommendation will be based on the need, overall cost, and ease of use for that particular client.

Client Referrals

All compensation paid to Financially in Tune is paid directly by our clients. We do not receive any additional monetary compensation when a client engages a recommended service provider. We may, however, receive certain non-cash benefits from discount brokers recommended to clients. These benefits may include electronic client statements and discounts on investment research, educational materials and software. It is our firm's policy to restrict non-cash ("soft dollar") compensation to products and services that directly enhance our ability to render quality advice to our clients.

Directed Brokerage

Financially in Tune does not require or engage in directed brokerage involving its accounts.

We recognize our obligation to seek "best execution" for its clients, however, it is our belief that the determinative factor is not always the lowest possible cost, but rather if the selected service provider's transactions represent the best "qualitative" execution while taking into consideration the full range of services provided. Therefore, Financially in Tune will seek services involving competitive rates but that may not necessarily result in the lowest possible rate for each transaction. The firm periodically reviews its policies regarding recommending service providers to clients in light of its duty to seek "best execution."

The client may direct the firm (in writing) to use another particular broker-dealer to execute some or all transactions for the client's account. In these circumstances, the client is responsible for negotiating, *in advance of the transaction*, all of the terms and/or arrangements for their account with their selected broker-dealer. Financially in Tune will not be obligated to seek better execution services or prices from these other broker-dealers, nor will we be able to aggregate client transactions for execution through other custodians with orders for other accounts we manage. As a result, the client choosing his or her own broker-dealer may pay higher commissions or other transaction costs, experience greater spreads, or receive less favorable net prices on transactions for the account than would otherwise be the case. Further, pursuant the firm's obligation of best execution, Financially in Tune reserves the right to decline a client's request to direct brokerage if the firm believes any directed brokerage arrangement would result in additional operational difficulties, expense, or risk to the firm.

Trade Aggregation

Transactions or orders in a security may be "aggregated" or "batched" for several clients at approximately the same time. Financially in Tune may (but is not obligated to) aggregate orders in an attempt to obtain best execution, negotiate favorable transaction rates, or to allocate equitably among client accounts should there be differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed separately. In certain situations, the firm will execute individual purchase or sales of securities when deemed necessary for a particular account.

With aggregated orders, transactions will generally be averaged as to price and allocated among the clients on a *pro rata* basis on any given day and the firm will attempt to do so in accordance with applicable industry rules and/or guidance provided by statute. The firm shall not receive any additional compensation or remuneration as a result of the aggregation transactions.

In the event Financially in Tune determines that a prorated allocation is not appropriate under particular circumstances, the allocation will be made based upon other relevant factors, which may include (in no particular order):

- when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weighting relative to other portfolios with similar mandates;
- allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts;

- if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts, such as that which might occur due to unforeseen changes in an account's assets after the order is placed; or
- when a *pro rata* allocation of a potential execution would result in a *de minimis* allocation in one or more accounts, an account may be excluded from the allocation and transactions may be executed on a *pro rata* basis among the remaining accounts.

The firm reviews both its trade aggregation procedures and allocation processes on a periodic basis to ensure it remains within stated policies and/or regulation.

Item 13 – Review of Accounts

Whether and how often we will review your account depends upon the type of service you engage us to provide. Not all types of agreements automatically include periodic reviews.

Review of Financial Planning and Investment Consultation Accounts

Hourly, as-needed financial planning and investment consultation agreements with Financially in Tune terminate upon delivery of the plan or advice to the client. We do not automatically provide ongoing reviews under this type of agreement, and are under no obligation to contact a client whose engagement was completed to recommend changes to his or her financial plan, or to any of the recommendations and advice provided in the past. Reviews are an important part of ensuring that a plan continues to meet a client's needs, however, and we encourage all clients to re-engage us for periodic check-ups or portfolio reviews. It is the client's responsibility to initiate these reviews under a new or amended client agreement.

Review of Portfolio Management Accounts

Financially in Tune reviews portfolio management accounts no less often than quarterly. Additional reviews may be triggered by events or research related to a specific holding, a change in our view of the merits of a holding, or information related to the macro-economic climate affecting a sector or holding within that sector. We may review portfolio management accounts when considering an additional holding or an increase in a current position. If a client needs to generate cash, adds cash, or if the cash level rises above what we believe is appropriate for the investment environment, given that particular client's stated risk tolerance and objectives, this may also trigger a review.

Item 14 – Client Referrals and Other Compensation

Financially in Tune does not engage in solicitation activities as defined by Rule 206(4)-3 of the Investment Advisers Act of 1940 (as amended), or similar state statute, nor does it pay a direct or indirect fee for referrals.

As stated earlier, Financially in Tune and associated personnel may be members of the Garrett Planning Network, NAPFA, FPA, and other professional associations. A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for participant firms or individual financial planners within a selected state or region. These passive websites may provide means for interested persons to contact a firm or planner via electronic mail, telephone number, or other contact information, in order to interview the participating firm or planner.

Members of the public may also choose to telephone association staff to inquire about a firm or individual planner within their area, and would receive the same or similar information.

Prospective clients locating Financially in Tune or Jeanne Gibson Sullivan via such an association are not actively marketed by the association. Clients who find us in this way do not pay more for their services than clients referred to us in another fashion, such as by another client. Financially in Tune does not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.²

Financially in Tune may provide referrals to various other professionals as a service to its clients. The firm does not have an agreement with or receive referral fees from any other persons or firms for these referrals. Any fees charged by these entities are completely separate from fees charged by Financially in Tune.

Item 15 – Custody

All client funds and securities will be maintained by unaffiliated, qualified custodians such as banks, broker-dealers, mutual fund companies, or transfer agents, and not with or by Financially in Tune or any of our associates. We do not have, and will not accept, custody of client funds or securities.

In keeping with our policy of not having custody of client funds or securities:

- Firm policies restrict Financially in Tune and our associated persons from acting as trustee for or having full power of attorney over a client account.³
- We do not collect fees for services to be performed more than six months in advance *and* in excess of \$1,200.
- At no time will a firm employee be authorized to have knowledge of a client's account access information (i.e., online 401(k), personal brokerage, or bank accounts), even for the convenience or accommodation of the client or the client's legal agent when such access might result in physical control over client assets.

Clients will be provided with transaction confirmations and summary account statements provided directly by their selected service provider. Typically, these statements are provided on a monthly or quarterly basis, or as transactions occur.

Clients may, however, receive periodic reports or "snapshots" from Financially in Tune that include investment performance information. Clients are urged to compare the account statements received directly from the service provider with any report they receive from Financially in Tune.

Item 16 – Investment Discretion

For clients who engage Financially in Tune for portfolio management services, those services are most often provided via a discretionary account agreement. Similar to a limited power of attorney, discretionary authority allows us to implement investment decisions, such as buys or sells of securities on behalf of an account without prior client authorization in order to meet the account objectives.⁴

²The firm believes this arrangement is in consonance with SEC No-Action Letter No. 1251421 in its response to the National Football League Players Association.

³ An associate may, however, serve as an unpaid trustee for the account of an immediate family member.

⁴ By definition, discretionary account transactions do not involve those with respect only to a trade execution's price or time.

Should a portfolio management client prefer his or her account to be managed in a non-discretionary manner, thereby requiring client approval prior to execution of any and all transactions, we have the authority to either terminate the account or continue to manage the account under a higher asset-based fee.

All account restrictions, limitations, and rescissions will be made in writing by the client and approved in writing by a firm principal. A record will be made and retained per regulation for each of these actions.

Item 17 – Voting Client Securities

Proxy Voting

The firm does not vote client proxies. Clients maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other events pertaining to the client's investment assets.

Other Corporate Actions

Financially in Tune has no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets.

Firm's Receipt of Materials

If Financially in Tune receives correspondence for a client relating to the voting of his or her securities, class action litigation, or other corporate actions, it will typically forward the correspondence to the client, or to another entity such as the client's attorney, if directed by the client to do so.

Item 18 – Financial Information

Due to the nature of Financially in Tune's services, an audited balance sheet is not required nor included in this disclosure. No further material financial information is required to be provided.

Item 19 – Requirements for State-Registered Advisers

Please see the accompanying ADV Part 2B Brochure Supplement beginning on the next page for information regarding the firm's managing member and firm principal, Jeanne Gibson Sullivan.

Part 2B: Brochure Supplement (Advisory Personnel)

Managing Member/Firm Principal/Investment Adviser Representative

Jeanne Gibson Sullivan, CFP®⁵ Year of Birth: 1957

Educational Background and Business Experience

Education

Bachelor of Arts in Economics, cum laude, Mount Holyoke College, South Hadley, MA

Master of Arts in Law and Diplomacy, Fletcher School of Law and Diplomacy, Tufts University, Medford, MA

Certified Financial Planner Program, Boston University, Boston, MA

Business Experience

Senior Wealth Manager: Back Bay Financial Group, Boston, MA 04/2000-12/2010

Vice President/Consultant on mutual fund distribution & marketing: Financial Research Corp(FRC)/Funds Distributor/The Boston Co., Boston, MA 1997-2000, 1990-1993

Financial Advisor: U.S. Financial Advisors, Wakefield, MA 1995-1997

Marketing Manager: BayBank, Boston, MA 1993-1994

Marketing Manager Fidelity USA (brokerage): Fidelity Investments 1987-1989

Marketing Manager: American Express, New York, NY 1984-1987

Research Associate: The Hay Group, Philadelphia, PA 1980-1982

Credit Analyst: Provident National Bank, Philadelphia, PA 1979-1980

Summer Intern: U.S. Department of State, Washington, D.C. Summer of 1978

Disciplinary Information

Ms. Sullivan has not been the subject of any disciplinary action that would require disclosure.

Other Business Activities

Ms. Sullivan is not currently engaged in any other business activities.

Additional Compensation

Financially in Tune employees do not accept or receive additional economic benefit (i.e., sales awards or other prizes) for providing advisory services to firm clients.

Supervision

Ms. Sullivan serves in multiple capacities with the firm: Managing Member, Firm Principal, Financial Planner, and Investment Adviser Representative, and she is responsible for the supervision of the firm's advisory services activities and any of its staff. The firm recognizes that not having all organizational duties segregated may potentially create a conflict of interest.

To address any such potential conflicts, Financially in Tune employs policies and procedures to ensure timely, accurate record keeping and supervision. The firm may outsource certain functions to qualified entities to assist in these efforts when deemed necessary.

Questions relative to the firm, staff, its services, or this ADV Part 2 or its Advisory Personnel Supplemental Brochure may be made to the attention of Ms. Sullivan at (781) 587-0582.

Additional information about the firm, other advisory firms, or an associated representative is available at www.adviserinfo.sec.gov. A search for firms or associated personnel can be accomplished by name or firm identifier, known as an IARD number. The IARD number for Financially in Tune, LLC is 156200.

The business and disciplinary history of an investment advisory firm and its representatives may also be obtained by calling the Massachusetts Securities Division at (617) 727-3548.

5 About the CFP® Professional Designation

The **CERTIFIED FINANCIAL PLANNER™**, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® 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.

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 Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include 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 includes 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 *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- 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.