

Disclosure Brochure

Financial Planning Counselors, Inc. DBA SmartPlan Investing

711 W. Indiantown Road, Suite C5

Jupiter, FL 33458

(561) 744-9547

www.smartplaninvesting.com

January 1, 2019

This brochure provides information about the qualifications and business practices of SmartPlan Investing. If you have any questions about the contents of this brochure, please contact us at (561) 744-9547 or roy@smartplaninvesting.com. 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 SmartPlan Investing is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

Form ADV Part 2 (“Disclosure Brochure”) requires registered investment advisers to amend their brochure when information becomes materially inaccurate and to review the Disclosure Brochure at least annually. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

We have reviewed our Disclosure Brochure dated January 1, 2018 and made no material changes to it as of January 1, 2019.

If you have any questions or would like a complete copy of our Disclosure Brochure, please contact Roy Wiley, President, at (561) 744-9547 or roy@smartplaninvesting.com. There is no charge for a copy of the Disclosure Brochure.

Additional information about SmartPlan Investing is available on the SEC's website at www.adviserinfo.sec.gov.

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Advisory Business

Financial Planning Counselors, Inc. is a privately held corporation organized in 1968 and operating in Florida since 1983. Financial Planning Counselors, Inc. conducts business as SmartPlan Investing and provides investment advisory services as a Florida-registered investment adviser¹ since 2002. Roy E. Wiley is President, Compliance Officer, and owner of the firm.

At SmartPlan Investing, our objective is to help you invest your assets with a goal of meeting your investment objectives and financial needs.

Financial Coaching

We provide financial coaching on matters involving securities as well as non-securities topics, such as tax planning. First, we meet with you to discuss your current financial and investment objectives, investment experience, and goals. With information you provide, we prepare a brief analysis to help you decide how your present financial situation meets your financial goals. Then, if you would like a more thorough analysis and recommendations from us, we will prepare the *Free Market Investment Analysis* and *Cost Analysis Report*. This presents you with an assessment of your investment portfolio in terms of portfolio risk, volatility, diversification factors, cost, and overall portfolio effectiveness. For businesses who are interested in an analysis their employee retirement plans, we prepare a *Free Market Fiduciary Investment Analysis*. The analysis advises fiduciaries in analyzing how well their organization meets a fiduciary standard of excellence and in improving their long-term investment performance.

We will make recommendations for implementing the investment advice we give you. You are under no obligation to act on our recommendations. Moreover, if you elect to act on any of our recommendations, there is no obligation to affect the transaction through any company recommended. Our recommendations are based on your financial situation at the time the analysis is presented and based on financial information disclosed by you. Certain assumptions are made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is in no way an indication of future performance. We do not offer any guarantees or promises that your financial goals and objectives will be met.

¹ Registration as an investment adviser does not imply a certain level of skill or training.

Investment Consulting and Monitoring Services

SmartPlan Investing has entered into a Co-Advisor Agreement with Matson Money, Inc. (“Matson Money”), an investment advisor registered with the U.S. Securities and Exchange Commission. SmartPlan Investing and Matson Money are not related entities; neither has an ownership interest in the other, nor does any member or shareholder of either entity own an interest in the other. Under this agreement with Matson Money, SmartPlan Investing provides to Investment Consulting and Monitoring Services to you. These services include the following:

- Advice on asset allocation;²
- Recommendations on an investment strategy;
- Assistance in the preparation of an investment policy statement and any restrictions;
- Evaluation of each client’s historical investment performance;
- Performance monitoring; and
- Controlling and measuring investment expenses.

If you choose to go forward with these services, you will enter into a three-party investment management agreement with SmartPlan Investing and Matson Money. Under this agreement, Matson Money has full discretionary authority to supervise and direct your investment accounts in accordance with the investment objective for each account. Matson Money makes and implements investment decisions without prior consultation with you, except for any restrictions you provide to Matson Money in writing.

Matson Money’s services are provided through its Matson Fund Platform³ and Frontier Adjusted Portfolio Program. In these programs, Matson Money allocates assets to, and invests your accounts primarily in shares of any one or a combination of series of the “Matson Money, Inc. Family of Funds of The RBB Fund, Inc.” (“Matson Fund”), a no-load mutual fund affiliated with Matson Money. Each series of the Matson Fund is advised by Matson Money and sub-advised by Dimensional Fund Advisors, Inc. (“DFA”), an unaffiliated, registered investment adviser. Each series is also a “fund of funds” which invests primarily in shares of other mutual funds.

² Our advice on securities is limited to investments in mutual funds.

³ A program offered by Matson, Private Account Asset Allocation, is no longer available from Matson to new clients. Our clients who participated in this program continue to participate in order to avoid adverse tax consequences that they may incur if they changed to another program.

More specifically, the series invest primarily in no-load mutual funds managed by DFA. DFA, as sub-adviser to each series, selects the underlying DFA mutual funds based on the investment characteristics specified by Matson Money and described in the Matson Money prospectus. Each series is designed to target specified percentages of certain asset classes in each series' applicable investment category to seek maximum portfolio diversification, enhanced return opportunities and diminished portfolio volatility. Matson Money reserves the right, in its sole discretion, to create, and allocate assets in client accounts to, additional series of the Matson Fund in the future. Matson Money may also invest your assets in unaffiliated cash sweep vehicles for temporary or other defensive purposes.

We recommend Matson Money's programs because they typically allocate your assets among various asset class funds, in accordance with your goals, financial situation and investment constraints.

We will provide you with Matson Money's disclosure brochure that discusses services, fees, types of investments, and allocation models, among other things. We encourage you to read Matson Money's disclosure brochure and the mutual fund prospectuses. If you have any questions, we will be happy to answer them. If you agree and choose to proceed, we will explain and assist you with the paperwork required to open an account. We will help you determine the appropriate allocation model as well as act as a liaison between you and Matson Money. Ongoing, we will review your account activity on a regular basis and not less than annually, meet with you to re-assess your financial situation and report any changes to Matson Money.

Investor Education Events

We also offer our expertise through educational financial workshops. These workshops are presented individually or in groups, usually monthly. Our presentations focus on a variety of issues, such as investments, financial planning, qualified retirement plans, and success coaching.

Fees and Compensation

Financial Coaching and Investor Education Events

There is no fee charged for an initial consultation, the *Investor Inventory* or our Investor Education Events. The charge to prepare the *Free Market Investment Analysis and Cost*

Analysis Report or the *Free Market Fiduciary Investment Analysis* is usually between \$500 and \$1000, payable in advance, and may be paid by check. While this charge is negotiable, it is not refundable once we have started to prepare the analysis.

Investment Management Fees

The Matson Fund Platform and Frontier Adjusted Portfolio Program Fees

Your investments in Matson Funds are subject to embedded advisory and other fees and expenses, as described in each fund's prospectus. When you participate in a Matson Money program, ultimately your investments bear all fund-related fees and expenses, including brokerage fees and operating expenses. Matson Money receives fees of .50% on each fund's average daily net assets as described in the prospectus. Dimensional Fund Advisors ("DFA"), a sub-adviser to Matson Money, also receives a sub-advisory fee from each fund. No sales loads are paid to Matson Money, DFA, SmartPlan Investing, or any other parties with respect to fund investments.

Annual fees paid to SmartPlan Investing are:

<u>Total Assets under Management</u>	<u>Maximum Annual Fee</u>
First \$500,000	0.99%
Next \$500,000	0.99%
Next \$3,000,000	0.75%
Over \$4,000,000	0.50%

Fees are negotiable.

Matson Money bills fees, quarterly, in advance, at one-fourth of the annual rate. The fees are based on the market value of your account on the last business day of the preceding calendar quarter. You will find the market value of your account on the statement you receive from the custodian carrying your account and on statements provided by Matson Money. The initial fee is due at the time your account is funded and is pro-rated for the number of days remaining in the quarter. The custodian of your assets will deduct the fees from your account and send the fees to Matson.

Clients who invest in Matson Funds through different co-advisers may pay lower or higher fees to their co-adviser than other investors in the same funds.

Matson Money⁴ withdraws your fees automatically from your account. Matson Money pays SmartPlan Investing directly. SmartPlan Investing will not, and has no authority to, withdraw fees from your account. With prior notice, Matson Money is willing to permit you to pay the advisory fees directly to SmartPlan Investing. Fees compensate SmartPlan Investing for maintaining a relationship with you, ensuring that information about your specific goals, financial situation and investment constraints remain up-to-date, and responding to your inquiries. Matson Money receives no part of these fees.

Other Charges

All management fees are separate from charges assessed by third parties, such as broker/dealers, custodians, mutual fund companies, etc. Each rebalancing or reallocation of your portfolio may involve transaction charges imposed by the custodian. Brokerage and other transaction costs charged by broker/dealers executing the transactions and custodians maintaining your assets are in addition to the management fees and are non-negotiable. Mutual funds, variable annuities or other platforms may assess other fees and expenses, such as 12B-1 fees and/or commissions in connection with the placement of your funds into certain investments. SmartPlan Investing does not receive any of these commissions, charges, and/or fees. Our representatives may receive commissions from insurance products purchased by you. See “*Other Financial Industry Activities and Affiliations*” below for more details.

General Information

You have the right to terminate your agreement with SmartPlan Investing and/or Matson Money without penalty within five (5) business days. Otherwise, your agreement may be terminated by any of the parties by giving 30 days prior written notice to the other. Prepaid fees will be refunded by Matson on a pro-rata basis.

Depending on individual arrangements made, fees paid by one client may be higher or lower than fees paid by another client under similar circumstances. Advice provided by SmartPlan Investing may differ from one client to another.

The fees charged are calculated as described above and are not charged based on a share of capital gains upon, or capital appreciation of, the funds, or any portion of the funds of an advisory client.

⁴ In the case of ERISA accounts, your custodian withdraws the fee.

SmartPlan Investing and its representatives do not represent, warranty, or imply that any services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections.

Performance-Based Fees and Side-By-Side Management

We do not accept performance-based fees – that is, fees based on a share of capital gains or appreciation of the assets of a client. We do not participate in side-by-side management. Side-by-side management refers to the practice charging performance-based fees for account management while at the same time managing accounts that are not charged performance-based fees.

Types of Clients

We provide our advisory services to individual investors, trusts, estates, and small business owners. There is no minimum net worth or minimum portfolio requirement for our financial coaching services. While we do not have any requirements for opening or maintaining an account, participation in the Matson Fund Platform and Frontier Adjusted Portfolios require and have no minimum investment.

Methods of Analysis, Investment Strategies, and Risk of Loss

We understand that Matson Money utilizes Modern Portfolio Theory and the Efficient Market Philosophy to create and manage portfolios that fall on the efficient frontier. These portfolios are reviewed typically on a quarterly basis and rebalanced as needed. Matson Money does not make asset allocation decisions based on the conditions of the economy or the market, but rather on economic research related to the way various asset classes have performed and the correlation of their performance over time.

Investment strategies are dictated by Matson Money within the asset allocation models and underlying mutual funds. Matson Money may use variable annuities or other insurance products. Asset allocation with quarterly rebalancing is typical but may be more or less frequent depending upon the particular portfolio manager's strategies and/or market conditions.

Investing in securities involves risk of loss that you should be prepared to bear. Investment values will fluctuate, are subject to market volatility, and may be worth more or less than original cost. Typically, Matson Money requests clients to sell securities in

order to make funds available to purchase the mutual funds or other commingled investment vehicles Matson Money recommends. In those situations where there would be adverse tax consequences to a client, Matson Money may recommend the client hold the security or sell it over time in a tax efficient manner.

Disciplinary Information

We are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of SmartPlan Investing or the integrity of our management. We have no information that applies to this item.

Other Financial Industry Activities and Affiliations

We are required to disclose material relationships that we may have with related financial industry participants.

Currently, we recommend only one portfolio manager, Matson Money. However, we reserve the right to change if we believe there is a more appropriate choice in the future. Other portfolio managers may use similar strategies as Matson Money, may cost more or less than Matson Money, may minimize overall portfolio turnover, or may have investment philosophies like our own. We are required to put your interests before our own interests. Consequently, we have implemented these procedures to make sure that you benefit from using our recommended portfolio managers: (1) We gather detailed information from you to determine if you will benefit more from using Matson Money, rather than another portfolio manager. (2) Ongoing, we review Matson Money's performance and handling of your portfolio. (3) We review other portfolio managers' programs to become familiar with alternatives that may be appropriate for you.

An affiliate of SmartPlan Investing, Covenant Financial, Inc., DBA SmartPlan Financial Services, is an accounting firm and our owner, Mr. Wiley is a certified public accountant, providing tax and accounting services to individuals and business clients not considered investment advisory in nature. Mr. Wiley devotes approximately 20% of his time to duties other than giving investment advice. These duties include providing operational oversight, other managerial duties, and providing additional services as an accountant.

Additionally, we have a fiduciary responsibility to our clients. This fiduciary responsibility requires us to put your interests before our own or anyone else's interests.

We have developed concrete procedures to reduce the potential for any conflict that may arise and adopted a Code of Ethics (see “*Code of Ethics, Participation or Interest in Client Transactions and Personal Trading*” below).

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

SmartPlan Investing has adopted a formal Code of Ethics. This Code of Ethics includes requirements to make sure that we meet our fiduciary responsibilities:

1. We will put your interests before our interests.
2. You have the right to specify your investment objectives, guidelines, and/or conditions on the overall management of your account.
3. We will not make investment decisions for our personal portfolios if the decision is based on information that is not also available to the investing public.
4. We will not participate in private placements or initial public offerings (IPO's) that may affect your investments without disclosure to you.
5. We always make every effort to comply with all applicable federal and state regulations governing registered investment advisers.

The full text of our Code of Ethics is available to you on request.

On occasion, we may buy or sell securities that we recommend to clients. This practice would create a conflict of interest if the transactions were structured to trade on the market impact caused by recommendations made to our clients. Our clients' transactions and our own transactions usually trade in sufficiently broad markets where these transactions will not have an appreciable impact on the securities' market value. Mr. Wiley reviews all personal transactions quarterly to make sure that personal transactions are consistent with advice given to clients.

Brokerage Practices

Selection of Brokerage and Custodial Services

SmartPlan Investing does not recommend brokerage firms for client transactions. If you are investing in one of the programs managed by Matson Money, Matson Money requires that you designate a broker/dealer and a custodian acceptable to Matson Money. Generally, Matson Money requests that you open custody accounts with either Trust Company of America or Charles Schwab Trust and brokerage accounts with their

affiliated broker-dealers: (1) GEMISYS Securities Corporation (a/k/a TCAdvisors Network, Inc.) or (2) Charles Schwab & Co., Inc. Matson Money also will approve of custody accounts with other custodians, such as U.S. Bank, and its affiliated broker-dealer, U.S. Bancorp Investments. For ERISA accounts, Matson Money will permit clients to use as their third-party administrator and recordkeeper, Aspire Financial Services, LLC, DWC ERISA Consultants, LLC, MG Trust Company, and TD Ameritrade along with each administrator's respective custodian.

Review of Accounts

Our representatives review client accounts periodically and at least annually. Third party portfolio managers, such as Matson Money, monitor accounts daily for trading and rebalancing purposes. We do not provide regular written reports but rely on Matson Money to provide reports to you. The mutual fund managers and/or the brokerage firm handling your account(s) send you account statements at least quarterly, but usually monthly. These account statements show money balances, investment values, and transactions. Account activity, positions, and account balances are available for view 24 hours a day on Matson Money's web site.

Client Referrals and Other Compensation

Matson Money may provide marketing assistance to SmartPlan Investing. While Matson Money generally charges for marketing assistance, some marketing assistance is provided without charge as the amount of assets referred to Matson Money by SmartPlan Investing increases. Matson Money also provides their investment advisory services to advisers and their representatives, at low or no cost and at reduced costs to family members when SmartPlan Investing has referred at least \$20 million in client assets to Matson Money. See *Other Financial Industry Activities and Affiliations* above for a description of our procedures addressing potential conflicts when recommending Matson Money.

Client Appreciation – We may invite clients to bring guests to a periodic customer appreciation dinner. If the guest becomes our client, it could be construed that the client bringing the guest was compensated by a meal.

Custody

You will not give us authority to withdraw securities or funds from your account. Your funds and securities will be held with a bank, broker/dealer, or other independent

qualified custodian. We do not accept physical custody of any of your funds and/or securities. We do not accept or forward securities certificates to your custodian. We do not produce account statements. You will receive account statements from the custodian holding your funds and securities at least quarterly. Please review account statements for accuracy and let us know if there are any discrepancies.

Investment Discretion

We do not exercise investment discretion on your behalf.

Voting Client Securities

Your brokerage firm or custodian may send proxies or other solicitations about your securities directly to you. We do not accept authority to vote securities on your behalf.

Financial Information

SmartPlan Investing does not require the prepayment of fees in excess of \$500 and more than six months in advance and does not have discretionary authority over, or custody of, client funds and securities. SmartPlan Investing has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients nor has it been the subject of a bankruptcy proceeding.

Requirements for State-Registered Advisers

Principal Executive Officers

Roy E. Wiley, President and Compliance Officer

See attached Form ADV Part 2B – Brochure Supplement for information about Mr. Wiley.

Other Business Activities

See “Other Financial Industries Activities and Affiliations” above.

Calculation of Performance-Based Fees

This item does not apply to SmartPlan Investing or to Mr. Wiley.

Arbitration, Civil Suits, Etc.

This item does not apply to SmartPlan Investing or to Mr. Wiley.

Relationships or Arrangements with Issuers

This item does not apply to SmartPlan Investing or to Mr. Wiley.

Bankruptcy

This item does not apply to SmartPlan Investing or to Mr. Wiley.

Brochure Supplement

Jennifer Foster

**Financial Planning Counselors, Inc.
DBA SmartPlan Investing**

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January 1, 2019

This brochure provides information about Jennifer Foster that supplements the SmartPlan Investing brochure. You should have received a copy of that brochure. Please contact Jennifer Foster at (561) 744-9547 x 2 if you did not receive SmartPlan Investing's brochure or if you have any questions about the contents of this supplement.

Additional information about Jennifer Foster is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Jennifer Marie Foster

Year of Birth: 1976

Formal Education after High School:

- Palm Beach State College 2000 - 2003

Business Background for the Preceding Five Years:

- SmartPlan Investing, Admin Assistant and Investment Coordinator 2004 - Present
- Covenant Financial & Tax, Inc. DBA SmartPlan Financial Services, Admin Assistant 2004 -2013

Jennifer Foster is an Investment Advisor Representative. An Investment Advisor Representative is licensed and regulated by their state. While state laws and regulations vary, the education, experience and testing requirements for licensure as an Investment Advisor Representative include passing of the vigorous Series 65 exam.

Disciplinary Information

This item does not apply to Jennifer Foster.

Other Business Activities

This item does not apply to Jennifer Foster.

Additional Compensation

Jennifer Foster does not receive any additional compensation from non-clients for providing advisory services.

Supervision

Jennifer Foster's supervisor is Roy E. Wiley, President and Compliance Officer (561-744-9547). Roy E. Wiley reviews Ms. Foster's client account activities, correspondence, transactions, and personal securities transactions regularly for inappropriate actions.

Requirements for State-Registered Advisers

Arbitration Claims, Civil, Self-Regulatory Organization, or Administrative Proceedings, and Bankruptcy

These items do not apply to Ms. Foster.

Brochure Supplement

Joshua B. Helman

**Financial Planning Counselors, Inc.
DBA SmartPlan Investing**

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January 1, 2019

This brochure provides information about Joshua B. Helman that supplements the SmartPlan Investing brochure. You should have received a copy of that brochure. Please contact Roy Wiley, President, at (561) 744-9547 if you did not receive SmartPlan Investing's brochure or if you have any questions about the contents of this supplement.

Additional information about Joshua B. Helman is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Joshua B. Helman

Year of Birth: 1966

Formal Education after High School:

- Harvard Medical School, 1993
- Harvard University, 1988

Business Background for the Preceding Five Years:

- SmartPlan Investing, Investment Adviser Representative, 2007 - Present
- University of Florida, Physician, 2004 - Present

Disciplinary Information

This item does not apply to Dr. Helman.

Other Business Activities

Dr. Helman's duties at the University of Florida account for a substantial amount of his time and income but are unrelated to his duties as an IAR of SmartPlan Investing.

In addition, Dr. Helman is a licensed insurance agent who may sell insurance products to advisory clients. Commissions are earned on the sale of insurance products. If Dr. Helman recommends insurance products to you, you are under no obligation to purchase the products through him. Even though this may be a potential conflict of interest, we believe insurance products complement and enhance advisory services. Before you purchase insurance based on Dr. Helman's recommendation, he will explain to you the reasons for the recommendation and provide you with details regarding his compensation.

Additional Compensation

Dr. Helman does not receive any additional compensation from non-clients for providing advisory services.

Supervision

Dr. Helman's supervisor is Roy E. Wiley, President and Compliance Officer (561-744-9547). Roy E. Wiley reviews Dr. Helman's account activities, correspondence, transactions, and personal securities transactions regularly for inappropriate actions.

Requirements for State-Registered Advisers

Arbitration Claims, Civil, Self-Regulatory Organization, or Administrative Proceedings, and Bankruptcy

These items do not apply to Dr. Helman.

Brochure Supplement

Mathew E. Kotecki

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January 1, 2019

This brochure provides information about Mathew E. Kotecki that supplements the SmartPlan Investing brochure. You should have received a copy of that brochure. Please contact Roy Wiley, President, at (561) 744-9547 if you did not receive SmartPlan Investing's brochure or if you have any questions about the contents of /this supplement.

Additional information about Mathew E. Kotecki is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Mathew E. Kotecki

Year of Birth: 1983

Formal Education after High School:

- Florida Institute of Technology

Business Background for the Preceding Five Years:

- SmartPlan Investing, Investment Adviser Representative, 2015 - Present
- Willis Marine, Inc., Naval Architect, 2006 – Present
- America Light, Design Engineer, 2010 - 2012

Disciplinary Information

This item does not apply to Mr. Kotecki.

Other Business Activities

Mr. Kotecki is employed by Willis Marine, Inc. as a Naval Architect. Presently, this activity involves a substantial amount of his time and income but are unrelated to his duties as an IAR of SmartPlan Investing.

Additional Compensation

Mr. Kotecki does not receive any additional compensation from non-clients for providing advisory services.

Supervision

Mr. Kotecki's supervisor is Roy E. Wiley, President and Compliance Officer (561-744-9547). Roy E. Wiley reviews Mr. Kotecki's client account activities, correspondence, transactions, and personal securities transactions regularly for inappropriate actions.

Requirements for State-Registered Advisers

Arbitration Claims, Civil, Self-Regulatory Organization, or Administrative Proceedings, and Bankruptcy

These items do not apply to Mr. Kotecki.

Brochure Supplement

Robroy Wiley

**Financial Planning Counselors, Inc.
DBA SmartPlan Investing**

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January 1, 2019

This brochure provides information about Robroy Wiley that supplements the SmartPlan Investing brochure. You should have received a copy of that brochure. Please contact Roy Wiley, President, at (561) 744-9547 if you did not receive SmartPlan Investing's brochure or if you have any questions about the contents of /this supplement.

Additional information about Robroy Wiley is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Robroy Wiley

Year of Birth: 1972

Formal Education after High School:

- Georgia State University, BBA-Finance, 2006

Business Background for the Preceding Five Years:

- SmartPlan Investing, Investment Adviser Representative, 2013 - Present
- Rooms To Go, Visual Merchandiser, 2006 – 2015
- SmartPlan Investing, Social Media Consultant, 2011 - Present

Disciplinary Information

This item does not apply to Mr. Wiley.

Other Business Activities

Mr. Wiley has no other business activities.

Additional Compensation

Mr. Wiley does not receive any additional compensation from non-clients for providing advisory services.

Supervision

Mr. Wiley's supervisor is Roy E. Wiley, President and Compliance Officer (561-744-9547). Roy E. Wiley reviews Robroy Wiley's client account activities, correspondence, transactions, and personal securities transactions regularly for inappropriate actions.

Requirements for State-Registered Advisers

Arbitration Claims, Civil, Self-Regulatory Organization, or Administrative Proceedings, and Bankruptcy

These items do not apply to Mr. Wiley.

Brochure Supplement

Paul Spiering

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Additional information about Paul Spiering is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Paul Spiering

Year of Birth: 1967

Formal Education after High School:

- BA, Business Major, Calvin College, 1989
- MBA, Marketing Major, Finance Minor, Indiana University, 1994

Business Background for the Preceding Five Years:

- SmartPlan Investing, Jupiter, FL – 04/2018 to Present
- Unemployed, Caregiver, Tequesta, FL - 02/2017 – 03/2018
- Wolverine Gas and Oil Corporation, Grand Rapids, MI 04/2004 – 12/2016

Disciplinary Information

This item does not apply to Mr. Spiering

Other Business Activities

Mr. Spiering is not involved in other business activities.

Additional Compensation

Mr. Spiering does not receive any additional compensation from non-clients for providing advisory services.

Supervision

Mr. Spiering's direct supervisor is Roy E. Wiley, President and Compliance Officer (561-744-9547). Roy E. Wiley reviews Mr. Spiering's client account activities, correspondence, transactions, and personal securities transactions regularly for inappropriate actions.

Requirements for State-Registered Advisers

Arbitration Claims, Civil, Self-Regulatory Organization, or Administrative Proceedings, and Bankruptcy

These items do not apply to Mr. Spiering.

Brochure Supplement

Roy E. Wiley, AIF®

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Additional information about Roy E. Wiley, AIF® is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Roy E. Wiley, AIF®

Year of Birth: 1945

Formal Education after High School:

- BBA Florida Atlantic University, 1974

Business Background for the Preceding Five Years:

- SmartPlan Investing, President, Compliance Officer and IAR, 2004 – Present
Owner 2011 - Present
- Covenant Financial & Tax, Inc. DBA SmartPlan Financial Services, Owner,
1992 - Present
- Roy E. Wiley, CPA, 1976 – Present

Mr. Wiley holds credentials as a Certified Public Accountant (CPA) from American Institute of Certified Public Accountants. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education, minimum experience levels, and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, Mr. Wiley is required to complete eighty hours of continuing professional education every two years.

In addition, Mr. Wiley is an Accredited Investment Fiduciary® (AIF®). The AIF designation certifies that he has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF® designation, Mr. Wiley completed a training program, successfully passed a comprehensive, closed-book final examination under the supervision of a proctor and agreed to abide by the AIF®, Code of Ethics. In order to maintain the AIF®, designation, he must annually renew his affirmation of the AIF®, Code of Ethics and complete six hours of continuing education credits. The certification is administered by The Center for Fiduciary Studies, LLC (a Fiduciary360 (fi360) company).

Disciplinary Information

This item does not apply to Mr. Wiley.

Other Business Activities

Mr. Wiley's activities as a certified public accountant and owner of Covenant Financial dba Wiley CPA and involves about 10 hours of his time each week.

Additional Compensation

Mr. Wiley does not receive any additional compensation from non-clients for providing advisory services.

Supervision

There are no supervisors senior to Mr. Wiley. Mr. Wiley is responsible for his own supervision. He adheres to high standards of ethical behavior required by our Code of Ethics.

Requirements for State-Registered Advisers

Arbitration Claims, Civil, Self-Regulatory Organization, or Administrative Proceedings, and Bankruptcy

These items do not apply to Mr. Wiley.