TOWNSEND

Retirement & Legacy Planning

Disclosure Brochure

Townsend Client Disclosure Brochure (Form ADV Part 2A) and Brochure Supplements (Form ADV Part 2B)

Item 1 – Cover Page

Townsend & Associates, Inc.
conducting advisory business as **Townsend**
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Westminster, CO 80234
Ph: 303-452-5986
www.townsendretirement.com

Date of Brochure: February 8, 2021.

This Brochure provides information about the qualifications and business practices of Townsend & Associates, Inc. conducting investment advisory services as "Townsend." If you have any questions about the contents of this Brochure, please contact Shawn Kelly at 303-452-5986 or at shawn@townsendretirement.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 Townsend is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information on this website by searching for our firm name Townsend & Associates, Inc. or our business name Townsend. You also may search for information by using the firm's CRD number **113681**.

Any references to Townsend as a "registered investment adviser" being "registered" does not does not imply a certain level of skill or training.

Item 2 – Material Changes

Since the Annual Amendment filing on February 29, 2020, Townsend has not made any material amendments, however, certain non-material changes were included at Items 4 and 12 regarding the firm's advisory services.

Townsend's Chief Compliance Officer, Shawn Kelly, remains available to address any questions that a client or prospective client has about these changes or any other aspect of this Brochure.

Item 3 – Table of Contents

Item 1 – Cover Page 1
Item 2 – Material Changes 1
Item 3 – Table of Contents 2
Item 4 – Advisory Business 4
General Description of Primary Advisory Services 4
Advice Regarding Certain Types of Investments 4
Tailor Advisory Services to Individual Needs of Clients 5
Wrap Fee Programs 5
Client Assets Managed by Townsend 5
Miscellaneous Disclosures 5
Item 5 – Fees and Compensation 7
Financial Planning Services 7
Financial Plans, Financial Consultations and Asset Allocation Services 7
Asset Management 9
Townsend Managed Account Program (TMAP) 9
Variable Annuity Management 10
Seminars 11
Publications 11
Securities Commission Transaction 11
Item 6 – Performance-Based Fees and Side-By-Side Management 12
Item 7 – Types of Clients 12
Minimum Investment Amounts Required 12
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss 12
Methods of Analysis 12
Charting 13
Fundamental 13
Technical 13
Investment Strategies 13
Risk of Loss 14
Item 9 – Disciplinary Information 16
Item 10 – Other Financial Industry Activities and Affiliations 17
Broker-Dealer Affiliation 17
Insurance Activities 17
Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading 18
Code of Ethics Summary 18
Affiliate and Employee Personal Securities Transactions Disclosure 18
Item 12 – Brokerage Practices 18
Factors Considered When Recommending Broker-Dealers 18
Non-Soft Dollar Research and Other Benefits 19
Other Considerations 19
Brokerage for Client Referrals 20
Directed Brokerage 20

Block Trading Policy 20
Item 13 – Review of Accounts 21
Account Reviews and Reviewers 21
Statements and Reports 21
Item 14 – Client Referrals and Other Compensation 21
Item 15 – Custody 21
Item 16 – Investment Discretion 22
Item 17 – Voting Client Securities 22
Item 18 – Financial Information 23
CUSTOMER PRIVACY POLICY NOTICE 24
Form ADV Part 2B Brochure Supplement - Jeffery Townsend 26
Form ADV Part 2B Brochure Supplement - Shawn R. Kelly 29
Form ADV Part 2B Brochure Supplement - Theresa L. Thomas 32
Form ADV Part 2B Brochure Supplement - Mark E. Thomas 35
Form ADV Part 2B Brochure Supplement - Tiffany A. Brown 38
Form ADV Part 2B Brochure Supplement – Andrew W. Hanna 43
Form ADV Part 2B Brochure Supplement – Steven K. Carlisle 46
Form ADV Part 2B Brochure Supplement – Christine White 49
Form ADV Part 2B Brochure Supplement – Antwann Jamar Holmes 53
Form ADV Part 2B Brochure Supplement – Derek S. Cheshire 57
Form ADV Part 2B Brochure Supplement – Richard Harrison 61
Form ADV Part 2B Brochure Supplement – Jonathan Amick 65
Form ADV Part 2B Brochure Supplement – Kaitlin E. Bell 68
Form ADV Part 2B Brochure Supplement – Nathaniel Francescato 72

Item 4 – Advisory Business

Townsend & Associates, Inc. doing business as Townsend is an investment advisor registered with the United States Securities and Exchange Commission ("SEC") and is a corporation formed under the laws of the State of Colorado.

- Jeffery Townsend is the principal owner and CEO of Townsend & Associates, Inc.
- Townsend & Associates, Inc. has been registered as an investment advisor since April 2006.
- Townsend & Associates, Inc. has been in business since it incorporated in 1991.

General Description of Primary Advisory Services

The following are brief descriptions of Townsend's primary advisory services. A more detailed description of Townsend's advisory services is provided in *Item 5 – Fees and Compensation* so that clients and prospective clients can review the description of services and description of fees in a side-by-side manner.

Financial Planning Services - Townsend provides advisory services in the form of financial planning services. Financial planning services do not involve the active management of client accounts, but instead focuses on a client's overall financial situation. Financial planning can be described as helping individuals determine and set their long-term financial goals, through investments, tax planning, asset allocation, risk management, retirement planning, and other areas. The role of a financial planner is to find ways to help the client understand his/her overall financial situation and help the client set financial objectives.

Asset Management Services - Townsend provides advisory services in the form of discretionary or non-discretionary Asset Management Services. Asset Management Services involve providing clients with continuous and on-going supervision over client accounts. This means that Townsend will continuously monitor a client's account and make trades in client accounts when necessary.

To commence the investment advisory process,Townsend will ascertain each client's investment objective(s) and then allocate the client's assets consistent with the client's designated investment objective(s). Once allocated, Townsend provides ongoing supervision of the account(s). Before engaging Townsend to provide investment advisory services, clients are required to enter into an *Investment Advisory Agreement* with Townsend setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the fee that is due from the client.

Advice Regarding Certain Types of Investments

Townsend provides investment advice on the following types of investments:

- Mutual Funds
- Exchange-listed securities (i.e. stocks)
- Securities traded over-the-counter (i.e. stocks)
- Fixed income securities (i.e. bonds)
- Closed-End Funds and Exchange Traded Funds (ETFs)
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- United States government securities

Townsend does not provide advice on foreign issues, warrants, commercial paper, futures contracts on tangibles and intangibles, or hedge funds and other types of private (i.e. non-registered) securities.

When providing asset management services, Townsend typically constructs each client's account holdings using mutual funds, ETFs, stocks, bonds, options, and variable annuities to build diversified portfolios. It is not Townsend's typical investment strategy to attempt to time the market but we may increase cash holdings modestly as deemed appropriate, based on your risk tolerance and our expectations of market behavior. We may modify our investment strategy to accommodate special situations such as low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations. *(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)*

Tailor Advisory Services to Individual Needs of Clients

Our advisory services are always provided based on the individual needs of each client. This means, for example, that you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. We work with each client on a one-on-one basis through interviews and questionnaires to determine the client's investment objectives and suitability information.

Disclosure Statement

A copy of Townsend's written Brochure as set forth on Part 2A of Form ADV, in addition to our Form ADV Part 3 (CRS), shall be provided to each client prior to, or contemporaneously with, the execution of the Financial Advisory Agreement.

Wrap Fee Programs

Townsend does not participate in wrap fee programs by providing portfolio management services.

Client Assets Managed by Townsend

The amount of client assets managed by Townsend totaled $856,188,555 as of December 31, 2020. $855,414,905 is managed on a discretionary basis and $773,650 is managed on a non-discretionary basis.

Miscellaneous Disclosures

Limitations of Financial Planning and Non-Investment Consulting/Implementation Services. To the extent requested by the client, Townsend may provide financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. Neither Townsend, nor its investment adviser representatives assist clients with the implementation of any financial plan, unless they have agreed to do so in writing. In addition, Townsend does not monitor a client's financial plan, and it is the client's responsibility to revisit the financial plan with Townsend, if desired. Townsend does not serve as a law firm or accounting firm, and no portion of its services should be construed as legal or accounting services. Accordingly, Townsend does not prepare estate planning documents or tax returns. To the extent requested by a client, Townsend may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance agents, etc.), including representatives of Townsend in their separate individual capacities as representatives of Securities America, Inc., an SEC registered and FINRA member broker-dealer, and as licensed insurance agents. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Townsend and/or its representatives. **Please Note**: If the client engages any unaffiliated professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. If, and when, Townsend is involved in a specific matter (i.e. estate planning, insurance, accounting-related engagement, etc.), it is the engaged licensed professional (i.e. attorney, accountant, insurance agent, etc.), and not Townsend, that is responsible for the quality and competency of the services provided. **Please Also Note-Conflict of Interest**: The recommendation by Townsend's representative that a client purchase a securities or

insurance commission product through Townsend's representative in his/her separate and individual capacity as a registered representative and/or as an insurance agent presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend investment or insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any securities or insurance commission products through such a representative. Clients are reminded that they may purchase securities and insurance products recommended by Townsend through other, non-affiliated broker-dealers and/or insurance agencies. **Townsend's Chief Compliance Officer, Shawn Kelly, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

Client Obligations. In performing its services, Townsend shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains their responsibility to promptly notify Townsend if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising Townsend's previous recommendations and/or services.

Non-Discretionary Service Limitations. Clients that determine to engage Townsend & Associates, Inc. on a non-discretionary investment advisory basis **must be willing to accept** that Townsend & Associates, Inc. cannot effect any account transactions without obtaining prior consent to any such transaction(s) from the client. Thus, in the event of a market correction, or if Townsend wants to make a specific transaction, and the client is unavailable, Townsend & Associates, Inc. will be unable to effect any account transactions (as it would for its discretionary clients) without first obtaining the client's consent.

Please Note: **Retirement Rollovers-Potential for Conflict of Interest**: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (I) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If Townsend recommends that a client roll over their retirement plan assets into an account to be managed by Townsend, such a recommendation creates a conflict of interest if Townsend will earn new (or increase its current) compensation as a result of the rollover. When acting in such capacity, Townsend serves as a fiduciary under the Employee Retirement Income Security Act (ERISA), or the Internal Revenue Code, or both. **No client is under any obligation to rollover retirement plan assets to an account managed by Townsend**. **Townsend's Chief Compliance Officer, Shawn Kelly remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.**

Use of Mutual Funds and Exchange Traded Funds. While Townsend may recommend allocating investment assets to mutual funds and exchange traded funds that are not available directly to the public, Townsend may also recommend that clients allocate investment assets to publicly available mutual funds and exchange traded funds that the client could obtain without engaging Townsend as an investment adviser. However, if a client or prospective client determines to allocate investment assets to publicly-available mutual funds and exchange traded funds without engaging Townsend as an investment adviser, the client or prospective client would not receive the benefit of Townsend's initial and ongoing investment advisory services.

Fidelity. As discussed below at Item 12, Townsend recommends that the Fidelity Institutional Wealth platform (hereinafter "Fidelity") and where clearing, custody and other brokerage services are provided by National Financial Services, LLC or Fidelity Brokerage Services LLC, Members FINRA NYSE, SIPC) serves as the broker-dealer/custodian for client investment advisory accounts. Broker-dealers such as Fidelity charge commissions and/or transaction fees for effecting certain securities transactions for your account. Fidelity does not charge commission or transaction fees for direct equity, ETF or options trades in certain accounts based upon account size and method of statement and confirmation delivery. In situations where trades are undertaken directly by the client with trade desk assistance, commission charges and fees may apply. The types of securities for which transaction fees, commissions, and/or other type fees (as well as

the amount of those fees) shall differ depending upon the broker-dealer/custodian (while certain custodians, including *Fidelity*, do not currently charge fees on certain individual equity transactions, other custodians do). Commissions may be waived in certain accounts based upon account size and method of statement delivery. In addition to Townsend's investment management fee, and certain brokerage transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). The fees charged by Fidelity, as well as the charges imposed at the mutual fund and exchange traded fund level, are in addition to Townsend's advisory fee referenced in Item 5 below.

Portfolio Activity. Townsend has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, Townsend will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, fund manager tenure, style drift, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when Townsend determines that changes to a client's portfolio are neither necessary nor prudent. Of course, as indicated below, there can be no assurance that investment decisions made by Townsend will be profitable or equal any specific performance level(s). Clients nonetheless remain subject to the fees described in Item 5 below during periods of account inactivity.

Item 5 – Fees and Compensation

In addition to the information provide in *Item 4 – Advisory Business*, this section provides additional details regarding Townsend's services along with descriptions of each service's fees and compensation arrangements.

Financial Planning Services

Financial Plans, Financial Consultations and Asset Allocation Services

The investment advisor representatives ("IARs") of Townsend offer financial planning services based on the client's specific needs and desires for future financial needs. The information gathered is presented in a format that does not make any promises or guarantees, but rather uses illustrations to show potential growth, all being hypothetical. Information is gathered using programs such as Financial Profiles, Morningstar and others. As part of this service, the IARs may also provide information and advice to clients regarding insurance products (i.e. life, health and long-term care), which products the IARs are licensed to sell in their separate capacity as insurance agents.

A fixed fee of $265 is charged for completing a financial profile. Fees will be due prior to services being provided.

If a client contracts for this service, Townsend will provide a custom financial plan consisting of a written evaluation and analysis of the information provided by the client, regarding the client's financial goals, objectives and current situation within 90 days of the date of the executed agreement, provided the client furnishes Townsend with all required information. Townsend will provide clients specific recommendations, which may include, but not be limited to the following: tax planning, retirement plan recommendations through the 401(k) Advantage program, risk management, investments, insurance, educational funding, retirement planning, employee benefits, estate planning, corporate or business coordination with personal situation, cash flow analysis, financing options and charitable donations.

In addition, the IARs offer individual financial consultation services to clients who do not wish to contract with Townsend for financial planning services or to clients who have established and maintain an account(s) for which the IARs will not act as registered representatives and will not implement transactions on behalf of the client. Townsend will charge a fee of $285 per hour for these services. This fee is non-negotiable. Townsend will charge 50% of the fee, based on an estimated number of hours of service required by the client, in advance, with the remainder of the fee due and payable upon completion of the consultation service(s).

After reviewing the plan with the client, if the client wishes to have the IARs implement the plan, they will implement the plan in their separate capacities as registered representatives. The IARs will then provide asset allocation services through ongoing monitoring, recommendations and advice to accounts established with an outside custodian. At no time will Townsend and/or its IARs act as custodian of any client account, nor will Townsend and/or its IARs have direct access to a client's funds and/or securities other than to deduct advisory fees.

All asset allocation services will be provided on a non-discretionary basis, and no transactions will be implemented by the IARs without first obtaining prior consent from the client.

A fixed fee of up to $150 will be charged for continuing financial planning services for a one year period. At the initial meeting, which is free, the client may be requested to provide copies of tax returns and other documents that may be used for future recommendations. Clients contracting for asset allocation services will also receive an updated financial profile on an annual basis. After the first year, if the client chooses to renew the services of Townsend for an additional year, an annual fee of up to $150 will be charged. Fees charged are not for trade implementation. Both the initial and annual fees are negotiable at the discretion of Townsend and are based on the client's financial situation and circumstances. In addition, if the client chooses to implement the recommendations of the IARs, the IARs will earn commissions in their separate capacities as registered representatives or independent insurance agents. Typically, fees for this service are due at the time the agreement is executed. However, Townsend may choose to send a billing notice directly to the client. At the discretion of Townsend, the annual fee may be negotiable based upon the client's financial situation and circumstances.

Services will terminate upon completion and presentation of a written plan or upon completion of the consultations. The agreement for asset allocation services will remain in effect for a period of one year from the date the agreement is executed. Either party may terminate services at any time by submitting written notice to all appropriate parties. Termination will be effective upon receipt of such notice. If services are terminated within five business days, services will be terminated without penalty. After the initial five business days, fees will be refunded on a prorated basis based on the time and effort expended by Townsend and/or its IARs prior to receipt of notice of termination. If the client is not satisfied with the written plan presented by Townsend and the plan cannot be rewritten to the client's satisfaction, the client may return all written documents prepared and presented to the client by Townsend for a full refund of all fees paid in advance.

401(k) Advantage Program

Townsend offers monitoring services to qualified retirement plan accounts established with outside custodians. These services can be provided to individual non-discretionary client accounts within a plan or to a plan administrator for review of the entire plan. Townsend's IARs will review accounts and provide recommendations regarding the implementation and allocation of the investments in the account and any new funds deposited into the account. However, all trade implementation in these accounts will be the responsibility of the custodian. Clients may either establish Townsend as an interested party on the account so that a copy of the statement will be delivered directly to Townsend's IAR or the client can provide the IAR with a copy of the account statement.

Fees for this service are charged generally up to $195 at the discretion of the Townsend IAR and are payable per year in advance. The exact fee for each client will be disclosed in the client agreement. Either party may terminate services at any time by providing written notice to the other and termination will be effective immediately. If services are terminated within five business days of signing the client agreement, services will be terminated without penalty. After the initial five business days, fees will be refunded on a prorated basis based on the time and effort expended by Townsend and/or its IARs prior to receipt of notice of termination

Newsletters

Quarterly newsletters are available on the Townsend web site. The newsletters are informational in nature and are available free of charge to both current and prospective clients.

Asset Management

Townsend Managed Account Program (TMAP)

Townsend's annual investment advisory fee shall be based upon a percentage (%) of the market value of the assets placed under the Firm's management. Management fees will be charged monthly in advance based upon the average daily balance of the client's account during the previous month, generally in accordance with the following fee schedules:

Annual Fee Billing Schedule – Portfolio Advantage – Mutual Fund and ETF portfolios

Market value of portfolio	Annual fee%
$1,000,000 or less	1.25%
$1,000,001 to $3,000,000	1.15%
$3,000,001 to $5,000,000	1.00%
$5,000,001 to $10,000,000	0.89%
$10,000,001 to $20,000,000	0.80%
$20,000,001 to $40,000,000	0.73%
$40,000,001 to $80,000,000	0.68%

Dynamic Advantage Annual Fee Billing (Stock Portfolios)

1.25%

Our fees are negotiable and may be determined by the extent and nature of the asset management services to be performed. See below for additional information on fee negotiation.

Townsend offers asset management services, including giving investment advice to a client based on the individual needs of the client. The IARs will assist clients in establishing an account with Fidelity Institutional Wealth Services (Fidelity) also known as Townsend Managed Account Program. A minimum of $10,000 in total assets under management per household is required to establish an account unless otherwise directed by an IAR. At the discretion of the IARs, client's family members will be allowed to aggregate or bundle household accounts to meet the account minimum. Fidelity will maintain custody of all funds and securities. Townsend and its IARs will not at any time maintain physical custody for any account nor will they have direct access to client funds and/or securities. The IARs will also assist clients in executing transactions in the account.

Fee Dispersion

Townsend, in its sole discretion, may waive its $10,000 minimum or charge a lesser investment management fee based upon certain criteria. That is, Townsend's investment advisory fee is negotiable at its discretion, depending upon objective and subjective factors including but not limited to: the amount of assets to be managed; portfolio composition; the scope and complexity of the engagement; the anticipated number of meetings and servicing needs; related accounts; future earning capacity; anticipated future additional assets; the professional(s) rendering the service(s); prior relationships with Townsend and/or its representatives, and negotiations with the client. As a result of these factors, similarly situated clients could pay different fees, the services to be provided by Townsend to any particular client could be available from other advisers at lower fees, and certain clients may have fees different than those specifically set forth above.

ANY QUESTIONS: Townsend's Chief Compliance Officer, Shawn Kelly, remains available to address any questions that a client or prospective client may have regarding advisory fees.

Management services for these accounts are provided on a discretionary basis. Discretionary authority is limited in that the IARs will prohibit themselves from withdrawing funds and/or securities from client accounts except when written authorization has been provided to have fees automatically deducted from the client's account and paid directly to Townsend.

Townsend will manage the client's assets for an annual fee based on a percentage of the assets under management. Management fees will be charged monthly in advance based upon the average daily balance of the client's account during the previous month. However, the initial monthly fee will be prorated based on the number of days that services were provided during the first billing period and will be billed in arrears. The client may ask to negotiate the annual management fees charged. Any negotiation of management fees will be at the sole discretion of Townsend's IARs and they will consider:

- Complexity of the client's situation
- Management fees charged by industry peers
- Experience and knowledge level of IARs providing the management services
- Anticipated future assets that will be added to the managed account

The exact fee that will be charged to the client will be fully disclosed in the client agreement executed between Townsend and the client. Fees will never be charged based upon a share of capital gains or capital appreciation in the client's account.

Townsend will allocate the client's assets to various types of securities investments. Typically, Townsend will allocate the client's assets to mutual funds, exchange traded funds (ETFs), stocks, bonds, and options (please see Item 8 below). Townsend charges an investment management fee on client's assets invested in these securities.

Management fees will be automatically deducted from the account. Clients will be required to provide written authorization to the custodian to have fees automatically deducted and paid to Townsend. The management fee will be included on the statement received from Fidelity.

There are no commissions charged for transactions. However, Fidelity may charge transaction fees to the client. Fees and charges will be noted on the client's statements and confirmations. Clients may also incur certain charges imposed by other third parties in connection with investments made through the account. These charges can include, but are not limited to, mutual funds sales loads, 12(b)-1 fees and surrender charges, variable annuity commissions and surrender charges, and IRA and Qualified Retirement Plan fees.

Management fees charged in the account are separate and distinct from the fees and expenses charged by mutual funds and variable annuities which may be recommended to clients. A description of these fees and expenses are available in each fund and annuity's prospectus.

Either party may terminate the agreement for management services by providing written or oral notice to the appropriate parties. Termination will be effective when all assets have been transferred and the account is closed. If services are terminated within five business days of signing the client agreement, services will be terminated without penalty. After the initial five business days, prepaid fees will be refunded on a prorated basis and Townsend will provide the client with a statement detailing the prorated charges.

Variable Annuity Management

Townsend, through its IARs, offers management services relative to the investment sub-divisions that comprise a variable annuity product owned by the client. The Townsend IAR, in his/her separate capacity as a registered representative of Securities America, Inc., an SEC registered and FINRA member broker-dealer ("SAI"), can assist the client with the initial purchase of a variable annuity product. The insurance company that issues the variable annuity or its outside custodian will maintain custody of the client's funds and securities at all times. Subsequent to purchase of the variable annuity product, the client has the option to have a Townsend's IAR provide investment management services on a limited discretionary or non-

discretionary basis. The type of discretionary authority authorized by the client will be reflected in the Townsend *Variable Annuity Management Services Agreement* (the "Agreement"). The IAR's authority is limited to exchanges among the variable annuity investment sub-accounts. At no time will the IAR have authority to withdraw funds and/or securities from the client's variable annuity account. The Agreement will specifically state which variable annuity policies are being managed. Townsend's IAR will receive commission compensation for the initial purchase of variable annuity product in his/her capacity as a registered representative of SAI based on the value invested in the annuity. Subsequent to the initial purchase of the variable annuity product, the IAR, in his capacity as a registered representative of SAI, will receive ongoing trail compensation based upon the market value of the annuity. Townsend **will not** charge a separate management fee for the variable annuity assets.

Either party may terminate asset management services and limited discretionary authority by providing written or oral notice to the appropriate parties. Termination will be effective when all assets have been transferred and the account is closed.

Seminars

Townsend IARs may also offer general financial planning seminars for clients. A fee to cover the cost of seminar materials may be charged to clients attending seminars. If any cost is being charged for the seminars, such cost will be disclosed to the client at the time the client signs up to attend the seminar. Fees for the seminars will be due at the time the client signs up to attend the seminar.

The clients will have five business days from the time they sign up for the seminar to cancel and receive a full refund of any fees paid in advance. After five business days, a refund will be given only if the client cancels at least 48 hours prior to the seminar. In addition, the client should be aware that should the client choose to contract with the Townsend IARs for additional services because of the financial planning seminars, then the IARs may earn advisory fees in their capacities as investment advisor representatives and/or commissions in their separate capacities as registered representatives and/or insurance agents.

Publications

Jeff Townsend, the CEO of Townsend, has written and published two books on retirement planning: "The Master Plan" and "Road to Retirement." The books are available for purchase by clients and non-clients through the Townsend web site, although purchase is limited to clients in those states where Townsend is registered. The books may also be purchased at the client's favorite bookstore. Seminar attendees and current clients may purchase the books at a discounted price.

Securities Commission Transaction

In the event that the client desires, the client can engage Townsend's representatives, in their individual capacities, as registered representatives of SAI, to implement investment recommendations on a commission basis. In the event the client chooses to purchase investment products through SAI, SAI will charge brokerage commissions to effect securities transactions, a portion of which commissions SAI shall pay to Townsend's representatives, as applicable. The brokerage commissions charged by SAI may be higher or lower than those charged by other broker-dealers. In addition, SAI, as well as Townsend's representatives, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment.

Conflict of Interest: The recommendation that a client purchase a commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Townsend's representatives. Townsend's Chief Compliance Officer, Shawn Kelly, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

Please Note: Clients may purchase investment products recommended by Townsend through other, non-affiliated broker dealers or agents.

Townsend does not receive more than 50% of its revenue from advisory clients as a result of commissions or other compensation for the sale of investment products Townsend recommends to its clients.

When Townsend's representatives sell an investment product on a commission basis, Townsend does not charge an advisory fee in addition to the commissions paid by the client for such product. When providing services on a management fee basis, Townsend's representatives do not also receive commission compensation for such services. However, a client may engage Townsend to provide investment management services on a fee basis and separate from such advisory services purchase an investment product from Townsend's representatives on a separate commission basis.

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

Neither Townsend nor any of its representatives accepts performance-based fees.

Item 7 – Types of Clients

Townsend generally provides investment advice to the following types of clients:

- Individuals
- High-Net Worth Individuals
- Pension and profit sharing plans
- Trusts, estates, or charitable organizations

All clients are required to execute an agreement for services in order to establish a client arrangement with Townsend, the Outside Money Manager, and/or the sponsor of a third-party money manager platform.

Minimum Investment Amounts Required

The minimum investment required for clients contracting for asset allocation services is at the discretion of the investment advisor representative providing the asset allocation services.

To establish an account at Fidelity, Townsend requires a minimum of $10,000 in total assets under management unless otherwise directed by an IAR. At the discretion of the IARs, client's family members will be allowed to aggregate or bundle household accounts to meet this account minimum.

Fee Dispersion:
Townsend, in its sole discretion, may waive its $10,000 minimum or charge a lesser investment management fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.). **Please Note**: As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS**: Townsend's Chief Compliance Officer, Shawn Kelly, remains available to address any questions that a client or prospective client may have regarding advisory fees.

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

Townsend uses the following methods of analysis in formulating investment advice:

Charting – This is a set of techniques used in technical analysis in which charts are used to plot price movements, volume, settlement prices, open interest, and other indicators, in order to anticipate future price movements. Users of these techniques, called chartists, believe that past trends in these indicators can be used to extrapolate future trends.

Fundamental – This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of companies). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

Technical – This is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

Investment Strategies

We use a combination of strategies in implementing our portfolio design.

Portfolio Advantage:

We start by building some of our portfolios based on Modern Portfolio Theory (MPT) which tries to maximize return and minimize risk by carefully choosing different assets. MPT is widely used in practice in the financial industry and several of its creators won a Nobel Prize for theory.

MPT is a mathematical formulation of the concept of diversification in investing with the aim of selecting a collection of investment assets that has a collectively lower risk than any individual asset. This is possible because different types of assets often change in value in opposite ways. For example, when stock values decline bond prices often increase and vice versa. In other words, a collection of both types of assets can theoretically have lower risk than if each type of asset were held individually.

So based on MPT our stock or equities are allocated among:

- Large capitalized companies – market capitalization of 5 billion or more;
- Medium capitalized companies – market capitalization of 1 to 5 billion dollars; and
- Small capitalized companies – market capitalization of 250 million to 1 billion dollars.

These three categories of stocks are further divided among:

- Value companies – Value companies or stock in these companies are deemed to be undervalued in price and are likely to pay higher than average dividends;
- Growth companies – Growth companies or stock in these companies are deemed poised for rapid growth and put emphasis on gaining market share; and
- Blend – These are companies or stock in companies that fall between growth and value.

Bonds or fixed income securities are an essential asset group that produces income in addition to lowering volatility. Our bonds are allocated between:

- Government Bonds – Treasuries, Municipal, Agency, International and Treasury Inflation Protected Securities (TIPS); and
- Corporate Bonds – Domestic and international investment grade, high-yield, and floating-rate bank loans

Bonds can be further divided among:

- Short-term maturities – 1 year or less;
- Intermediate-term maturities – 1 to 10 years; and
- Long-term maturities – more than 10 years.

The percentage we have in each area depends on your risk tolerance, which is determined by our risk assessment and the relative strength of the market.

The next step is the investment selection depending on your individual situation. Based upon our analysis, we select investments that we believe have a competitive advantage and are likely to remain competitive. Our investment committee researches, tests and scrutinizes many investment components, including strategies, costs, risk, manager tenure, and Alpha, (a measurement which represents the value a portfolio manager adds to or subtracts from a fund's return).

Dynamic Advantage

Our Dynamic Advantage is designed with individual stocks, individual bonds, bond ETF's, and bond mutual funds to construct our portfolios. Using state of the art analytics and research criteria, our investment committee analyzes and researches different companies and sectors that are currently undervalued or provide an ongoing dividend that fit our criteria. Additionally, by using this platform we may be able to lower the overall expense of the account.

Dynamic Advantage Growth and Income: This portfolio is modeled for the moderate investor. The portfolio targets investments and may provide above-average income and capital appreciation potential.

Dynamic Advantage Growth: This portfolio is modeled for investors leaning towards a higher emphasis on capital appreciation with some income through larger capitalized companies.

Dynamic Advantage Aggressive Growth: This portfolio is modeled for investors seeking primarily capital appreciation as the main objective. The portfolio is characterized by a higher degree of risk.

Additionally, Townsend may use the following investment strategies when managing client assets and/or providing investment advice:

> Tactical asset allocation. An active management portfolio strategy that rebalances the percentage of assets held in various categories in order to take advantage of market pricing anomalies or strong market sectors.
>
> Strategic asset allocation. Calls for setting target allocations and then periodically rebalancing the portfolio back to those targets as investment returns skew the original asset allocation percentages. The concept is akin to a "buy and hold" strategy, rather than an active trading approach. Of course, the strategic asset allocation targets may change over time as the client's goals and needs change and as the time horizon for major events such as retirement and college funding grow shorter.

Risk of Loss

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. Clients and prospective clients should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There

are certain additional risks associated when investing in securities through our investment management program.

- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.

- Equity (stock) market risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.

- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.

- Fixed Income Risk. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.

- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks. In particular, Townsend typically engages in "Covered Call Writing," which is the sale of in-, at-, or out-of- the money call option against a long security position held in a client portfolio. This type of transaction is used to generate income. It also serves to create downside protection in the event the security position declines in value. Income is received from the proceeds of the option sale. Such income may be reduced to the extent it is necessary to buy back the option position prior to its expiration. This strategy may involve a degree of trading velocity, transaction costs and significant losses if the underlying security has volatile price movement. Covered call strategies are generally suited for companies with little price volatility.

- ETF and Mutual Fund Risk – When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETFs or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. Clients will also incur brokerage costs when purchasing ETFs.

- Management Risk – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

Item 9 – Disciplinary Information

Item 9 is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

Item 10 – Other Financial Industry Activities and Affiliations

Neither Townsend, nor its representatives, are registered or have an application pending to register as a: futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

Except as described below, Townsend does not have any relationship or arrangement that is material to its advisory business or to its clients with any related person.

Broker-Dealer Affiliation

As disclosed above, certain of Townsend's representatives are also registered representatives of SAI, an SEC registered and FINRA member broker-dealer. Clients can therefore choose to engage these representatives in their individual capacities, to effect securities brokerage transactions on a commission basis.

Conflict of Interest: The recommendation that a client purchase an investment product on a commission basis through SAI presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from SAI. Clients are reminded that they may purchase investment products recommended by Townsend through other, non-affiliated broker-dealers. Townsend's Chief Compliance Officer, Shawn Kelly, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

Insurance Activities

Townsend & Associates, Inc. is a licensed insurance entity in several states. Townsend & Associates, Inc. conducts both its advisory services business and its insurance business under the business name "Townsend." Representatives of Townsend may be independently licensed as insurance agents through various insurance companies and may sell products through these companies as well as through Townsend & Associates, Inc., a licensed insurance entity. In this separate capacity, the representatives can receive commissions for selling insurance products.

Conflict of Interest: The recommendation that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Townsend's representatives. Clients are reminded that they may purchase insurance products recommended by Townsend through other, non-affiliated insurance agents. Townsend's Chief Compliance Officer, Shawn Kelly, remains available to address any questions that a client or prospective may have regarding this conflict of interest. Townsend's IARs are engaged in professions other than giving investment advice. They are registered representatives and may also be independently licensed as insurance agents. In addition, Jeff Townsend spends a small amount of time on various activities for rental properties owned by a family trust and Townsend Capital, LLC.

Townsend's IARs will recommend the assistance of qualified attorneys (not affiliated with Townsend) in the preparation of trusts if clients require this service. A list of the attorneys used will be provided to clients upon request. The client pays fees for these legal services directly to the attorneys. No solicitor or referral fees are paid to Townsend by the attorneys or by Townsend to the attorneys for this service.

Townsend does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients.

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

Code of Ethics Summary

According to the *Investment Advisers Act of 1940*, an investment advisor is considered a fiduciary. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts. In addition, an investment advisor has a duty of utmost good faith to act solely in the best interest of each of its clients. Townsend and its IARs have a fiduciary duty to all clients. Townsend has established a Code of Ethics which all employees must read and then execute an acknowledgement agreeing that they understand and agree to comply with the Townsend Code of Ethics. The fiduciary duty of Townsend and the IARs to clients is considered the core underlying principle for the Townsend Code of Ethics and represents the expected basis for all IAR dealings with clients. Townsend has the responsibility to make sure that the interests of clients are placed ahead of Townsend's or the IARs' own investment interests. All IARs will conduct business in an honest, ethical and fair manner. All IARs will comply with all federal and state securities laws at all times. Full disclosure of all material facts and l conflicts of interest will be provided to clients prior to services being conducted. All IARs have a responsibility to avoid circumstances that might negatively affect or appear to affect the IARs' duty of complete loyalty to their clients. This section is only intended to provide current clients and potential clients with a summary description of the Townsend Code of Ethics. If current clients or potential clients wish to review Townsend's Code of Ethics in its entirety, a copy may be requested from any of Townsend' IARs and a copy will be provided within 14 days of request.

Affiliate and Employee Personal Securities Transactions Disclosure

Townsend or its IARs may buy or sell securities or have an interest or position in a security for their personal account that they also recommend to clients. Townsend is and shall continue to be in compliance with *The Insider Trading and Securities Fraud Enforcement Act of 1988*. As these situations may represent a conflict of interest, it is a policy of Townsend that no IAR shall prefer their own interest to that of the advisory client. No person employed by Townsend may purchase or sell any security prior to a transaction or transactions being implemented for an advisory account. IARs shall not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of their employment unless the information is also available to the investing public upon reasonable inquiry. Townsend maintains a list of all securities holdings for it and all IARs which is reviewed on a regular basis by a principal of Townsend.

Item 12 – Brokerage Practices

Factors Considered When Recommending Broker-Dealers

In the event that the client requests that Townsend recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct Townsend to use a specific broker-dealer/custodian), Townsend generally recommends that investment management accounts be maintained at Fidelity. Prior to engaging Townsend to provide investment management services, the client will be required to enter into an agreement with Townsend setting forth the terms and conditions under which Townsend shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that Registrant considers in recommending Fidelity (or any other broker-dealer/custodian) to clients include historical relationship with Townsend, financial strength, reputation, execution capabilities, pricing, research, and service. Broker-dealers such as Fidelity can charge transaction fees for effecting certain securities transactions (***See*** Item 4 above). To the extent that a transaction fee will be payable by the client to Fidelity, the transaction fee shall be in addition to Townsend's investment advisory fee referenced in Item 5 above.

To the extent that a transaction fee is payable, Townsend shall have a duty to obtain best execution for such transaction. However, that does not mean that the client will not pay a transaction fee that is higher than another qualified broker-dealer might charge to effect the same transaction where Townsend

determines, in good faith, that the transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, transaction rates, and responsiveness. Accordingly, although Townsend will seek competitive rates, it may not necessarily obtain the lowest possible rates for client account transactions.

The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, Townsend's investment management fee. Townsend's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

Research and Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Townsend may receive from Fidelity (or another broker-dealer/custodian, investment platform, independent investment manager, and/or mutual fund sponsor) without cost (and/or at a discount) support services and/or products, certain of which assist Townsend to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by Townsend may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by Townsend in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that may be received may assist Townsend in managing and administering client accounts. Others do not directly provide such assistance, but rather assist Townsend to manage and further develop its business enterprise.

Townsend's clients do not pay more for investment transactions effected and/or assets maintained at Fidelity as a result of this arrangement. There is no corresponding commitment made by Townsend to Fidelity or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities, or other investment products as a result of the above arrangement.

ANY QUESTIONS: Townsend's Chief Compliance Officer, Shawn Kelly, remains available to address any questions that a client or prospective client may have regarding the above arrangements and the corresponding conflict of interest such arrangements create.

Other Considerations

Clients are under no obligation to act on the financial planning recommendations of Townsend. If Townsend or its IARs assist in the implementation of any recommendations, we are responsible to ensure that the client receives the best execution possible.

Townsend's IARs are registered representatives with SAI, a broker/dealer, member FINRA/SIPC. When placing securities transactions through SAI in their capacities as registered representatives, the IARs earn sales commissions.

Townsend has no formal soft dollar arrangements in place. Clients wishing to implement the advice of Townsend's IARs are free to select any broker they wish and are so informed. If the clients wish to have the IARs implement the advice in their capacities as registered representatives, their broker/dealer, SAI, will be used. SAI has a wide range of approved securities products for which it performs due diligence prior to selection. The registered representatives are required to adhere to these products when implementing securities transactions through SAI. Commissions charged for these products may be higher or lower than

commissions clients may be able to obtain if these transactions were implemented through another broker/dealer.

Townsend' IARs sell securities products in their separate capacities as registered representatives. Some IARs may also sell insurance products in their separate capacities as independently licensed insurance agents. They earn sales commissions when selling securities and insurance products. Some of the advice offered by the IARs may involve investments in mutual fund products. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as 12(b)-1 fees. Any 12b-1 fees received are assigned to a master business account maintained by the Townsend branch office. All individuals affiliated with the branch office are strictly compensated by salary, which salary is calculated based upon the value of that individual's client assets under management and does not account for brokerage commissions. Additionally, all clients served by any individual affiliated with the Townsend branch office receive financial planning services pursuant to a financial planning advisory services agreement with Townsend. As a result, any client who has a commission-based SAI account is also an advisory client of Townsend. Townsend has a fiduciary duty to act in the best interests of all advisory clients and the Townsend branch office has structured its compensation to individuals affiliated with the branch in a manner that is intended to eliminate any incentive to recommend commission-based products. All IARs of Townsend will discuss the advantages and disadvantages of establishing a fee-based account through Townsend versus establishing a commission-based account through SAI with each client. Townsend does not require its advisor representatives to encourage clients to implement investment advice through SAI. The branch office may receive a portion of the 12(b)-1 fees from some investment companies. Clients should be aware that these 12(b)-1 fees come from fund assets, and thus, indirectly from client's assets. Receipt of these fees could represent an incentive for registered representatives to recommend funds with 12(b)-1 fees or higher 12(b)-1 fees over funds with no fees or lower fees, therefore creating a potential conflict of interest.

Townsend from time to time may receive expense reimbursement for travel and/or marketing expenses from distributors of investment and/or insurance products. Travel expense reimbursements are typically a result of attendance at due diligence and/or investment training events hosted by product sponsors. Marketing expense reimbursements are typically the result of informal expense sharing arrangements in which product sponsors may underwrite costs incurred for marketing such as advertising, publishing and seminar expenses. Although receipt of these travel and marketing expense reimbursements are not predicated upon specific sales quotas, the product sponsor reimbursements are typically made by those sponsors for whom sales have been made or it is anticipated sales will be made.

ANY QUESTIONS: Townsend's Chief Compliance Officer, Shawn Kelly, remains available to address any questions that a client or prospective client may have regarding the above arrangements and the corresponding conflict of interest such arrangements create.

Brokerage for Client Referrals

Townsend does not receive referrals from broker-dealers.

Directed Brokerage

Townsend does not accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer).

Block Trading Policy

Transactions implemented by Townsend for client accounts are generally affected independently, unless the firm decides to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by the firm when Townsend believes such action may prove advantageous to clients. When Townsend aggregates client orders, the allocation of securities among client accounts will be done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate

more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among the firm's clients in proportion to the purchase and sale orders placed for each client account on any given day. When Townsend determines to aggregate client orders for the purchase or sale of securities, including securities in which Townsend may invest, the firm will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc*. It should be noted Townsend does not receive any additional compensation or remuneration as a result of aggregation.

Item 13 – Review of Accounts

Account Reviews and Reviewers

Townsend contacts all planning clients who have an investment account (variable annuity or life, or equity product) on at least a quarterly basis. Asset managed accounts are continually reviewed by the Townsend Investment Committee. The calendar is the triggering factor unless specific needs arise. Phone calls are originated from the client relations team and forwarded to the advisor if client has additional questions concerning their accounts and/or investment objectives. The role of the client relations team is to initiate the call from a public relations standpoint and then distributed to the IAR or financial planners for account specific questions or retirement planning recommendations.

Statements and Reports

Clients will receive confirmations and statements from the Investment Company, broker/dealer, or custodian at which the client's account is maintained at least quarterly. In addition, clients may receive on-demand aggregate performance reports showing the performance of their advisory accounts from Townsend on a daily basis.

Item 14 – Client Referrals and Other Compensation

As referenced in Item 12 above, Townsend may receive economic benefits from Fidelity including support services, without cost (and/or at a discount). Townsend's clients do not pay more for investment transactions effected and/or assets maintained at Fidelity as a result of this arrangement. There is no corresponding commitment made by Townsend to Fidelity or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

Townsend does not directly or indirectly compensate any person or entity in the event that a client is introduced to Townsend for referral purposes.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment advisor is deemed to have custody and must ensure proper procedures are implemented.

Townsend is deemed to have custody of client funds and securities whenever Townsend is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody Townsend will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which Townsend is deemed to have custody, the firm has established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the

establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from Townsend. When clients have questions about their account statements, they should contact Townsend or the qualified custodian preparing the statement.

Please Also Note: Custody Situations: Townsend engages in other practices and/or services on behalf of its clients that require disclosure at ADV Part 1, Item 9, but which practices and/or services are not subject to an annual surprise CPA examination in accordance with the guidance provided in the SEC's February 21, 2017 Investment Adviser Association No-Action Letter.

Item 16 – Investment Discretion

Through its asset management services and upon receiving written authorization from a client, Townsend will maintain trading authorization over client accounts. Upon receiving written authorization from the client, Townsend may implement trades on a discretionary basis. When discretionary authority is granted, Townsend will have the authority to determine the type of securities, the amount of securities that can be bought or sold, and the commission rates paid for the client's portfolio without obtaining the client's consent for each transaction. However, it is the policy of Townsend to consult with the client prior to making significant changes in the account even when discretionary trading authority is granted by the client.

If you decide to grant trading authorization on a **non-discretionary** basis, we will be required to contact you prior to implementing changes in your account. Therefore, you will be contacted and required to accept or reject our investment recommendations including:

- The security being recommended
- The number of shares or units
- Whether to buy or sell

Once the above factors are agreed upon, Townsend will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your accounts are managed on a non-discretionary basis, you need to know that if you are not able to be reached or are slow to respond to our request, it can have an adverse impact on the timing of trade implementations and we may not achieve the optimal trading price.

All clients have the ability to place reasonable restrictions on the types of investments that may be purchased in an account. Clients may also place reasonable limitations on the discretionary power granted to our firm so long as the limitations are specifically set forth or included as an attachment to the client agreement.

Item 17 – Voting Client Securities

Townsend will not vote proxies on behalf of your account. While there are some investment advisors that will vote proxies and other corporate decisions on behalf of their clients, we have determined that taking on the responsibility for voting client securities does not add enough value to the services provided to clients to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in your accounts managed by our firm. You will receive proxies directly from your account custodian or transfer agent and such documents will not be delivered by Townsend.

Item 18 – Financial Information

Townsend does not require or solicit prepayment of more than $1,200 in fees per client, six months or more in advance. Townsend is not subject to a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. Finally, Townsend has not been the subject of a bankruptcy petition at any time.

ANY QUESTIONS: Townsend's Chief Compliance Officer, Shawn Kelly remains available to address any questions regarding this Part 2A.

CUSTOMER PRIVACY POLICY NOTICE

This Privacy Notice is from Townsend, a registered investment advisor in the business of providing investment advisory services to customers.

Townsend is committed to safeguarding the confidential information of its clients. Townsend holds all personal information provided by clients in the strictest confidence. Townsend IARs may also be registered representatives of SAI, a registered broker/dealer that is not affiliated with Townsend. Townsend may also have relationships with other non-affiliated registered investment advisors, such as SAA, an affiliate of SAI, insurance companies, trust companies, custodians and other financial institution entities. Except as required or permitted by law, Townsend does not share confidential information about clients with non-affiliated third parties. In the unlikely event there were to be a change in this fundamental policy that would permit additional disclosures of client confidential information, Townsend will provide written notice to its clients, and clients will be given an opportunity to direct whether such disclosure is permissible.

AN IMPORTANT NOTICE CONCERNING CUSTOMER PRIVACY

Customer Information Collected. Townsend collects and develops personal information about clients, and some of that information is non-public personal information (Customer Information). The essential purpose for collecting Customer Information is to provide and service the financial products and services clients obtain from Townsend. The categories of Customer Information collected by Townsend depend upon the scope of the engagement with the client and are generally described below. As an investment advisor, Townsend collects and develops Customer Information about clients in order to provide investment advisory services. Customer Information Townsend collects includes:

- Information received from clients on financial inventories through consultations. This Customer Information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account and other records concerning clients' financial condition and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.
- Information developed as part of financial plans, analyses or investment advisory services.
- Information concerning investment advisory account transactions, such as wraps account transactions.
- Information about a client's financial products and services transactions with Townsend.

Data Security. Townsend restricts access to Customer Information to those IARs and employees who need the information to perform their job responsibilities. Townsend maintains agreements, as well as physical, electronic and procedural securities measures that comply with federal regulations to safeguard Customer Information about clients.

Use and Disclosure of Customer Information to Provide Customer Service for Accounts. To administer, manage and service customer accounts, process transactions and provide related services for client accounts, it is necessary for Townsend to provide access to Customer Information within the firm and to non-affiliated companies such as SAI, SAA, other investment advisors, other broker/dealers, trust companies, custodians and insurance companies. Townsend may also provide Customer Information outside of the firm as permitted by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas.

Former Clients. When clients close an account with Townsend, Townsend will continue to operate in accordance with the principles stated in the Notice.

Requirements of Federal Law. In November of 1999, Congress enacted the *Gramm-Leach-Bliley Act* (GLBA). The GLBA requires certain financial institutions, including broker-dealers and investment advisors, to protect the privacy of Customer Information. To the extent a financial institution discloses Customer Information to non-affiliated third parties, other than as permitted or required by law, customers must be

given the opportunity and means to opt out (or prevent) such disclosure. Please note that that Townsend does not disclose Customer Information to non-affiliated third parties, except as permitted or required by law (e.g., disclosures to service a client's account or to respond to subpoenas).

Form ADV Part 2B Brochure Supplement - Jeffery Townsend

Item 1 – Cover Page

Jeffery Townsend
Townsend & Associates, Inc.
d/b/a Townsend
2761 W. 120th Ave., Suite 200
Westminster, CO 80234
Ph: 303-452-5986

Date of Supplement: February 6, 2021

This brochure supplement provides information about Jeffery Townsend ("Jeff") that supplements the Townsend & Associates Inc. doing business as Townsend brochure. You should have received a copy of that brochure. Please contact Shawn Kelly at 303-452-5986 if you did not receive the Townsend brochure or if you have any questions about the contents of this supplement.

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

Item 2 – Educational Background and Business Experience

Jeffery Townsend, Born 1958

Educational Background:
Attended Front Range College (no degree conferred)
Completed Effective Supervisory Management Course

Industry Licenses:
Series 7 (Registered Representative)
Series 24 (Registered Principal)
Series 63 (Securities Agent State Law)

Business Experience:
Townsend & Associates, Inc., *Chief Executive Officer*, 01/2019 to Present
Townsend & Associates, Inc., *President*, 1991 to 01/2019
Townsend Capital, LLC, *President*, 09/2006 to Present
Townsend & Associates, Inc., *Investment Advisor Representative*, 03/1998 to Present
Securities America Inc., *Registered Representative*, 01/1995 to Present

Professional Designations:

Jeff Townsend has the Chartered Retirement Planning Counselor℠ (CRPC®) designation.

Chartered Retirement Planning Counselor (CRPC®)

Charter Retirement Planning Counselor℠ (CRPC®); the College for Financial Planning® awards the Chartered Retirement Planning Counselor℠ AND CRPC® designation to students who:

- successfully complete the program;
- pass the final examination; and
- comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding

relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.

Applicants must sign and return the Code of Ethics forms within six months of passing the final exam. Failure to complete and submit the forms within this time frame may result in termination of the applicant's candidacy. If an individual wishes to apply for authorization to use the Marks in the future, the individual may be required to fulfill the initial designation requirements in place at the time the individual passed the final examination.

Successful students receive a certificate and are granted the right to use the designation on correspondence and business cards for a two-year period.

Continued use of the CRPC® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the CRPC® designation by:

- completing 16 hours of continuing education;
- reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and to self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct; and
- paying a biennial renewal fee of $75.

Item 3 – Disciplinary Information

Jeff has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Registered Representative of Securities America, Inc.

Jeff is separately licensed as a registered representative with Securities America, Inc. ("SAI") an SEC registered broker-dealer. When acting in his separate capacity as a registered representative of SAI, he may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, he may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based SAI account in addition to a Townsend advisory account.

All commissions earned for brokerage transactions are assigned to a master business account maintained by the branch office. All individuals that are registered representatives with SAI are also investment advisor representatives of Townsend. None of these individuals, including Jeff, directly receive commissions earned for brokerage transactions. All individuals affiliated with the branch office are strictly compensated by salary, which salary is calculated based upon the value of that individual's client assets under management and does not account for brokerage commissions. Additionally, all clients served by any individual affiliated with the Townsend branch office receive financial planning services pursuant to a financial planning advisory services agreement with Townsend. As a result, any client who has a commission-based SAI account is also an advisory client of Townsend. Townsend has a fiduciary duty to act in the best interests of all advisory clients and the Townsend branch office has structured its compensation to individuals affiliated with the branch in a manner that is intended to eliminate any incentive to recommend commission-based products. Jeff will discuss the advantages and disadvantages of establishing a fee-based account through Townsend versus establishing a commission-based account through SAI with each client. Townsend does not require its advisor representatives to encourage clients to implement investment advice through SAI.

Jeff does not earn commissions in fee-based accounts.

Jeff will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. Any 12b-1 fees are treated in the same manner as other brokerage compensation, and are assigned to a master business account maintained by the Townsend branch office. 12b-1 fees come from fund assets, therefore,

indirectly from client assets. 12b-1 fees are received only in commission-based brokerage accounts. Jeff discusses with clients the selection of a 12b-1 paying mutual fund or other trail paying mutual funds. Townsend maintains records of all 12b-1 fee payments to Jeff which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through Townsend or SAI. However, if a client does not choose to accept Jeff's advice or decides not to establish an account through SAI or an SAI-approved custodian, Jeff may not be able to implement transactions for the client. Clients should understand that, due to certain regulatory constraints, Jeff, in his capacity as a SAI registered representative must place all purchases and sales of securities products in commission-based brokerage accounts through SAI or its other approved institutions.

Insurance Agent

Townsend & Associates, Inc. doing business as Townsend is a licensed insurance entity in several states. Additionally, Jeff is independently licensed to sell insurance and annuity products through various insurance companies as well as through Townsend & Associates as a licensed insurance entity. When acting in this capacity, he can receive commissions for selling insurance products.

Jeff may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect his judgment when recommending products to clients. While he endeavors at all times to put the interest of his clients first as a part of his and Townsend's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect his decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Jeff and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

Rental Properties

Jeff spends a small amount of time on various activities for rental properties owned by a family trust and by Townsend Capital, LLC.

Item 5 – Additional Compensation

Other than the fees detailed in the Townsend Form ADV Part 2A Disclosure Brochure, Jeff receives no other compensation related to advisory services provided to clients.

Item 6 – Supervision

Shawn Kelly is the Chief Compliance Officer of Townsend. Shawn is responsible for developing, overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including Jeff Townsend. Shawn can be contacted at 303-452-5986.

Form ADV Part 2B Brochure Supplement - Shawn R. Kelly

Item 1 – Cover Page

Shawn R. Kelly
Townsend & Associates, Inc.
d/b/a Townsend
2761 W. 120th Ave., Suite 200
Westminster, CO 80234
Ph: 303-452-5986

Date of Supplement: February 6, 2021

This brochure supplement provides information about Shawn R. Kelly ("Shawn") that supplements the Townsend & Associates Inc. doing business as Townsend brochure. You should have received a copy of that brochure. Please contact Shawn Kelly at 303-452-5986 if you did not receive the Townsend brochure or if you have any questions about the contents of this supplement.

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

Item 2 – Educational Background and Business Experience

Shawn R. Kelly, Born 1975

Educational Background:
Effective Supervisory Management Course
Bachelor of Science in Business Administration, Doane College: 1999

Industry Licenses:
Series 7 (Registered Representative)
Series 66 (Series 66 (Uniform Combined State Law Agent))
Series 53 (Municipal Securities Security Principal)
Series 4 (Registered Options Principal)
Series 24 (Registered Principal)
Series 99 (Operations Professional)

Business Experience:
Townsend & Associates, Inc., *President,* 01/2019 to Present
Townsend & Associates, Inc., *Chief Compliance Officer, 01/2008 to Present*
Townsend & Associates, Inc., *Producing Financial Advisor*, *Vice President*, 01/2008 to 01/2019
Securities America Advisors, Inc., *Registered Principal*, 01/2008 to Present
U.S. Bank, *Business Banking Officer,* 08/2007 to 12/2007
Securities America Inc., *Registered Representative*, *Compliance Examiner*, 01/2000 to 08/2007
Securities America Advisors, Inc., *Investment Advisor Representative, Compliance Examiner*

Professional Designation:

Shawn Kelly has the Chartered Retirement Planning Counselor℠ (CRPC®) designation.

Chartered Retirement Planning Counselor℠ (CRPC®)
Chartered Retirement Planning Counselor℠ (CRPC®); the College for Financial Planning® awards the Chartered Retirement Planning Counselor℠ and CRPC® designation to students who:

- successfully complete the program;

- pass the final examination; and
- comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.

Applicants must sign and return the Code of Ethics forms within six months of passing the final exam. Failure to complete and submit the forms within this time frame may result in termination of the individual's candidacy. If an individual wishes to apply for authorization to use the Marks in the future, he or she may be required to fulfill the initial designation requirements in place at the time of passing the exam.
Successful students receive a certificate and are granted the right to use the designation on correspondence and business cards for a two-year period.

Continued use of the CRPC® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the CRPC® designation by:

- completing 16 hours of continuing education;
- reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct; and
- paying a biennial renewal fee of $75.

Item 3 – Disciplinary Information

Shawn has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Registered Representative of Securities America, Inc.

Shawn is separately licensed as a registered representative with Securities America, Inc. ("SAI") an SEC registered broker-dealer. When acting in his separate capacity as a registered representative of SAI, he may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, he may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based SAI account in addition to a Townsend advisory account.

All commissions earned for brokerage transactions are assigned to a master business account maintained by the branch office. All individuals that are registered representatives with SAI are also investment advisor representatives of Townsend. None of these individuals, including Shawn, directly receive commissions earned for brokerage transactions. All individuals affiliated with the branch office are strictly compensated by salary, which salary is calculated based upon the value of that individual's client assets under management and does not account for brokerage commissions. Additionally, all clients served by any individual affiliated with the Townsend branch office receive financial planning services pursuant to a financial planning advisory services agreement with Townsend. As a result, any client who has a commission-based SAI account is also an advisory client of Townsend. Townsend has a fiduciary duty to act in the best interests of all advisory clients and the Townsend branch office has structured its compensation to individuals affiliated with the branch in a manner that is intended to eliminate any incentive to recommend commission-based products. Shawn will discuss the advantages and disadvantages of establishing a fee-based account through Townsend versus establishing a commission-based account through SAI with each client. Townsend does not require its advisor representatives to encourage clients to implement investment advice through SAI.

Shawn does not earn commissions in fee-based accounts. Shawn will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. Any 12b-1 fees are treated in the same manner as other brokerage compensation, and are assigned to a master business account maintained by the Townsend branch office. 12b-1 fees come from fund assets, therefore, indirectly from client assets. 12b-1 fees are received only in commission-based brokerage accounts. Shawn discusses with clients the selection of a 12b-1 paying mutual fund or other trail paying mutual funds. Townsend maintains records of all 12b-1 fee payments to Shawn which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through Townsend or SAI. However, if a client does not choose to accept Shawn's advice or decides not to establish an account through SAI or an SAI-approved custodian, Shawn may not be able to implement transactions for the client. Clients should understand that, due to certain regulatory constraints, Shawn, in his capacity as a SAI registered representative must place all purchases and sales of securities products in commission-based brokerage accounts through SAI or its other approved institutions.

Insurance Agent

Townsend & Associates, Inc. doing business as Townsend is a licensed insurance entity in several states. Additionally, Shawn is independently licensed to sell insurance and annuity products through various insurance companies as well as through Townsend & Associates as a licensed insurance entity. When acting in this capacity, he can receive commissions for selling insurance products.

Shawn may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect his judgment when recommending products to clients. While he endeavors at all times to put the interest of his clients first as a part of his and Townsend's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect his decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Shawn and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

Item 5 – Additional Compensation

Other than the fees detailed in the Townsend Form ADV Part 2A Disclosure Brochure, Shawn receives no other compensation related to advisory services provided to clients.

Item 6 – Supervision

Shawn Kelly is the Chief Compliance Officer of Townsend. He is responsible for developing, overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives. Shawn can be contacted at 303-452-5986.

Form ADV Part 2B Brochure Supplement - Theresa L. Thomas

Item 1 – Cover Page

Theresa L. Thomas
Townsend & Associates, Inc.
d/b/a Townsend
2761 W. 120th Ave., Suite 200
Westminster, CO 80234
Ph: 303-452-5986

Date of Supplement: February 6, 2021

This brochure supplement provides information about Theresa L. Thomas ("Theresa") that supplements the Townsend & Associates Inc. doing business as Townsend brochure. You should have received a copy of that brochure. Please contact Shawn Kelly at 303-452-5986 if you did not receive the Townsend brochure or if you have any questions about the contents of this supplement.

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

Item 2 – Educational Background and Business Experience

Theresa L. Thomas, Born 1964

Education Background:
Attended Front Range Community College (no degree conferred)

Industry Licenses:
Series 7 (Registered Representative)
Series 66 (Uniform Combined State Law Agent)
Series 63 (Securities Agent State Law)

Business Background:
Townsend & Associates, Inc., *Investment Advisor Representative*, 08/2007 to Present
Townsend & Associates, Inc., *Retirement Specialist,* 10/2006 – 08/2007
Securities America Inc., *Registered Representative*, 12/2001 to Present;
Ashton Financial Group, *Vice President, Mortgage Loan Officer,* 02/2005 to 10/2006;
Denver Mortgage, *Loan Officer*, 06/2004 to 02/2005
Turning Point Financial Solutions, Inc., *President, Insurance Agent*, 03/2004 to 10/2006;
Complete Spectrum Financial Services, *Insurance Agent*, 10/2001 to 09/2003
Complete Spectrum Lending, LLC, *Mortgage Consultant*, 12/2002 to 09/2003
Indianapolis Life Insurance, I*nsurance Agent*, 07/2002 to 10/2006

Professional Designation:

Theresa Thomas has the Chartered Retirement Planning Counselor℠ (CRPC®) designation.

Chartered Retirement Planning Counselor℠ (CRPC®)

Chartered Retirement Planning Counselor℠ (CRPC®); the College for Financial Planning® award the Chartered Retirement Planning Counselor℠ and CRPC® designation to students who:

- successfully complete the program;
- pass the final examination; and

- comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.

Applicants must sign and return the Code of Ethics forms within six months of passing the final exam. Failure to complete and submit the forms within this time frame may result in termination of the individual's candidacy. If an individual wishes to apply for authorization to use the Marks in the future, he or she may be required to fulfill the initial designation requirements in place at the time of passing the exam.
Successful students receive a certificate and are granted the right to use the designation on correspondence and business cards for a two-year period.
Continued use of the CRPC® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the CRPC® designation by:

- completing 16 hours of continuing education;
- reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct; and
- paying a biennial renewal fee of $75.

Item 3 – Disciplinary Information

Theresa Thomas has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Registered Representative of Securities America, Inc.

Theresa is separately licensed as a registered representative with Securities America, Inc. ("SAI") an SEC registered broker-dealer. When acting in her separate capacity as a registered representative of SAI, she may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, she may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based SAI account in addition to a Townsend advisory account.

All commissions earned for brokerage transactions are assigned to a master business account maintained by the branch office. All individuals that are registered representatives with SAI are also investment advisor representatives of Townsend. None of these individuals, including Theresa, directly receive commissions earned for brokerage transactions. All individuals affiliated with the branch office are strictly compensated by salary, which salary is calculated based upon the value of that individual's client assets under management and does not account for brokerage commissions. Additionally, all clients served by any individual affiliated with the Townsend branch office receive financial planning services pursuant to a financial planning advisory services agreement with Townsend. As a result, any client who has a commission-based SAI account is also an advisory client of Townsend. Townsend has a fiduciary duty to act in the best interests of all advisory clients and the Townsend branch office has structured its compensation to individuals affiliated with the branch in a manner that is intended to eliminate any incentive to recommend commission-based products. Theresa will discuss the advantages and disadvantages of establishing a fee-based account through Townsend versus establishing a commission-based account through SAI with each client. Townsend does not require its advisor representatives to encourage clients to implement investment advice through SAI.

Theresa does not earn commissions in fee-based accounts.

Theresa will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. Any 12b-1 fees are treated in the same manner as other brokerage compensation, and are assigned to a master business account maintained by the Townsend branch office. 12b-1 fees come from fund assets, therefore, indirectly from client assets. 12b-1 fees are received only in commission-based brokerage accounts. Theresa discusses with clients the selection of a 12b-1 paying mutual fund or other trail paying mutual funds. Townsend maintains records of all 12b-1 fee payments to Theresa which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through Townsend or SAI. However, if a client does not choose to accept Theresa's advice or decides not to establish an account through SAI or an SAI-approved custodian, Theresa may not be able to implement transactions for the client. Clients should understand that, due to certain regulatory constraints, Theresa, in her capacity as a SAI registered representative must place all purchases and sales of securities products in commission-based brokerage accounts through SAI or its other approved institutions.

Insurance Agent

Townsend & Associates, Inc. doing business as Townsend is a licensed insurance entity in several states. Additionally, Theresa is independently licensed to sell insurance and annuity products through various insurance companies as well as through Townsend & Associates as a licensed insurance entity. When acting in this capacity, she can receive commissions for selling insurance products.

Theresa may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect her judgment when recommending products to clients. While she endeavors at all times to put the interest of her clients first as a part of her and Townsend's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect her decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Theresa and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

Item 5 – Additional Compensation

Other than the fees detailed in the Townsend Form ADV Part 2A Disclosure Brochure, Theresa receives no other compensation related to advisory services provided to clients.

Item 6 – Supervision

Shawn Kelly is the Chief Compliance Officer of Townsend. He is responsible for developing, overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including Theresa Thomas. Shawn can be contacted at 303-452-5986.

Form ADV Part 2B Brochure Supplement - Mark E. Thomas

Item 1 – Cover Page

Mark E. Thomas
Townsend & Associates, Inc.
d/b/a Townsend
2761 W. 120th Ave., Suite 200
Westminster, CO 80234
Ph: 303-452-5986

Date of Supplement: February 6, 2021

This brochure supplement provides information about Mark E. Thomas ("Mark") that supplements the Townsend & Associates Inc. doing business as Townsend brochure. You should have received a copy of that brochure. Please contact Shawn Kelly at 303-452-5986 if you did not receive the Townsend brochure or if you have any questions about the contents of this supplement.

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

Item 2 – Educational Background and Business Experience

Mark E. Thomas, Born 1962

Educational Background:
Front Range Community College (no degree conferred)

Industry Licenses:
Series 7 (Registered Representative)
Series 66 (Uniform Combined State Law Agent)

Business Experience:
Townsend & Associates, Inc., *Investment Advisor Representative & Retirement Specialist*, 02/2010 to Present;
Securities America Inc., *Registered Representative*, 02/2010 to Present
LaFarge North America, *Assistant Plant Manager,* 12/2005 to 01/2010

Professional Designation:

Mark Thomas has the Chartered Retirement Planning Counselor℠ (CRPC®) designation.

Chartered Retirement Planning Counselor℠ (CRPC®)

Chartered Retirement Planning Counselor℠ (CRPC®); the College for Financial Planning® awards the Chartered Retirement Planning Counselor℠ And CRPC® designation to students who:

- successfully complete the program;
- pass the final examination; and
- comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the

College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.

Applicants must sign and return the Code of Ethics forms within six months of passing the final exam. Failure to complete and submit the forms within this time frame may result in termination of the individual's candidacy. If an individual wishes to apply for authorization to use the Marks in the future, he or she may be required to fulfill the initial designation requirements in place at the time of passing the exam.
Successful students receive a certificate and are granted the right to use the designation on correspondence and business cards for a two-year period.
Continued use of the CRPC® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the CRPC® designation by:

- completing 16 hours of continuing education;
- reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct; and
- paying a biennial renewal fee of $75.

Item 3 – Disciplinary Information

Mark has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Registered Representative of Securities America, Inc.

Mark is separately licensed as a registered representative with Securities America, Inc. ("SAI") an SEC registered broker-dealer. When acting in his separate capacity as a registered representative of SAI, he may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, he may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based SAI account in addition to a Townsend advisory account.

All commissions earned for brokerage transactions are assigned to a master business account maintained by the branch office. All individuals that are registered representatives with SAI are also investment advisor representatives of Townsend. None of these individuals, including Mark, directly receive commissions earned for brokerage transactions. All individuals affiliated with the branch office are strictly compensated by salary, which salary is calculated based upon the value of that individual's client assets under management and does not account for brokerage commissions. Additionally, all clients served by any individual affiliated with the Townsend branch office receive financial planning services pursuant to a financial planning advisory services agreement with Townsend. As a result, any client who has a commission-based SAI account is also an advisory client of Townsend. Townsend has a fiduciary duty to act in the best interests of all advisory clients and the Townsend branch office has structured its compensation to individuals affiliated with the branch in a manner that is intended to eliminate any incentive to recommend commission-based products. Mark will discuss the advantages and disadvantages of establishing a fee-based account through Townsend versus establishing a commission-based account through SAI with each client. Townsend does not require its advisor representatives to encourage clients to implement investment advice through SAI.

Mark does not earn commissions in fee-based accounts.

Mark will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. Any 12b-1 fees are treated in the same manner as other brokerage compensation, and are assigned to a master business account maintained by the Townsend branch office. 12b-1 fees come from fund assets, therefore, indirectly from client assets. 12b-1 fees are received only in commission-based brokerage accounts. Mark

discusses with clients the selection of a 12b-1 paying mutual fund or other trail paying mutual funds. Townsend maintains records of all 12b-1 fee payments to Mark which may be viewed by clients upon request.
Clients are never obligated or required to establish accounts through Townsend or SAI. However, if a client does not choose to accept Mark's advice or decides not to establish an account through SAI or an SAI-approved custodian, Mark may not be able to implement transactions for the client. Clients should understand that, due to certain regulatory constraints, Mark, in his capacity as a SAI registered representative must place all purchases and sales of securities products in commission-based brokerage accounts through SAI or its other approved institutions.

Insurance Agent

Townsend & Associates, Inc. doing business as Townsend is a licensed insurance entity in several states. Additionally, Mark is independently licensed to sell insurance and annuity products through various insurance companies as well as through Townsend & Associates as a licensed insurance entity. When acting in this capacity, he can receive commissions for selling insurance products.

Mark may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect his judgment when recommending products to clients. While he endeavors at all times to put the interest of his clients first as a part of his and Townsend' overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect his decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Mark and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

Item 5 – Additional Compensation

Other than the fees detailed in the Townsend Form ADV Part 2A Disclosure Brochure, Mark receives no other compensation related to advisory services provided to clients.

Item 6 – Supervision

Shawn Kelly is the Chief Compliance Officer of Townsend. Shawn is responsible for developing, overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including Mark Thomas. Shawn can be contacted at 303-452-5986.

Form ADV Part 2B Brochure Supplement - Tiffany A. Brown

Item 1 – Cover Page

Tiffany A. Brown
Townsend & Associates, Inc.
d/b/a Townsend
2761 W. 120th Ave., Suite 200
Westminster, CO 80234
Ph: 303-452-5986

Date of Supplement: February 6, 2021

This brochure supplement provides information about Tiffany A. Brown ("Tiffany") that supplements the Townsend & Associates Inc. doing business as Townsend brochure. You should have received a copy of that brochure. Please contact Shawn Kelly at 303-452-5986 if you did not receive the Townsend brochure or if you have any questions about the contents of this supplement.

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

Item 2 – Educational Background and Business Experience

Tiffany A. Brown, Born 1978

Education Background:
Chadron State College, 2000

Industry Licenses:
Series 7 (Registered Representative)
Series 66 (Uniform Combined State Law Agent)

Business Experience:
Townsend & Associates, Inc., *Financial Planner*, 10/2009 to Present;
Townsend & Associates, Inc., *Office Assistant*, 10/2007 to 10/2009
Securities America Inc., *Registered Representative*, 01/2008 to Present;
Community First National Bank (now d/b/a Bank of the West), *Credit Trainee*, *Financial Services Officer*, 01/2002 to 10/2007.

Professional Designations:

Tiffany holds the following professional designations:

[1]Chartered Retirement Planning Counselor℠ (CRPC®)
[2]Certified Financial Planner™ (CFP®)

Chartered Retirement Planning Counselor℠ (CRPC®)

[1]Chartered Retirement Planning Counselor℠ (CRPC®); the College for Financial Planning® awards the Chartered Retirement Planning Counselor℠ And CRPC® designation to students who:

- successfully complete the program;
- pass the final examination; and
- comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to

their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.

Applicants must sign and return the Code of Ethics forms within six months of passing the final exam. Failure to complete and submit the forms within this time frame may result in termination of the individual's candidacy. If an individual wishes to apply for authorization to use the Marks in the future, he or she may be required to fulfill the initial designation requirements in place at the time of passing the exam.

Successful students receive a certificate and are granted the right to use the designation on correspondence and business cards for a two-year period.

Continued use of the CRPC® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the CRPC® designation by:

- completing 16 hours of continuing education;
- reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct; and
- paying a biennial renewal fee of $75.

Certified Financial Planner™ (CFP®)

Certified Financial Planner Board of Standards, Inc. ("CFP Board") owns the CFP® certification mark, the CERTIFIED FINANCIAL PLANNER™ certification mark, and the CFP® certification mark (with flame design) logo in the United States (these marks are collectively referred to as the "CFP® marks"). The CFP Board authorizes use of the CFP® marks by individuals who successfully complete the CFP Board's initial and ongoing certification requirements.

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. Currently, more than 87,000 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 a 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 or an accepted equivalent, including completion of a financial plan development capstone course, and attain a Bachelor's Degree from an accredited college or university. CFP Board's financial planning subject areas include professional conduct and regulation, general principles of financial planning, education planning, risk management and insurance planning, investment planning, income tax planning, retirement savings and income planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, 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 – CFP Board requires 6,000 hours of experience through the Standard Pathway, or 4,000 hours of experience through the Apprenticeship Pathway that meets additional requirements ; and

- Ethics – Agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct*, which put clients' interest first; acknowledge CFP Board's right to enforce them through its *Disciplinary Rules and Procedures;* comply with the *Financial Planning Practice Standards* which determine what clients should reasonably expect from the financial planning engagement and complete a CFP® Certification Application which requires disclosure of an individual's background, including involvement in any criminal, civil, governmental, or self-regulatory agency proceeding or inquiry, bankruptcy, customer complaint, filing, termination/internal reviews conducted by the individual's employer or firm.

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 accepted by the CFP Board 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 – CFP® professionals agree to adhere to the high standards of ethics and practice outlined in CFP Board's Code of Ethics and Standards of Conduct and to acknowledge CFP Board's right to enforce them through its Disciplinary Rules and Procedures. The Code of Ethics and Standards of Conduct require that CFP Professionals provide financial planning services in the best interests of their clients.

- Certification Application – Properly complete a Certification Application to (i) acknowledge voluntary adherence to the terms and conditions of certification with CFP Board and (ii) disclose any involvement in criminal and civil proceedings, inquiries or investigations, bankruptcy filings, internal reviews and customer complaints.

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.

You may verify an individual's CFP® certification and background through the CFP Board. The verification function will allow you to verify an individual's certification status, CFP Board's disciplinary history and any bankruptcy disclosures in the past ten years. Additional regulatory information may also be found through FINRA'S BrokerCheck and the SEC's Investment Adviser Public Disclosure databases, which are free tools that may be used to conduct research on the background and experience of CFP® professionals and those who held CFP® certification at one time, including with respect to employment history, regulatory actions, and investment-related licensing information, arbitrations, and complaints.

CFP Acknowledgment: Tiffany acknowledges her responsibility as a CFP® Professional to adhere to the standards that have been established in the CFP Board's Standards of Professional Conduct. If you become aware that her conduct may violate the Standards of Professional Conduct, you may file a complaint with the CFP Board at www.CFP.net/complaint.

Item 3 – Disciplinary Information

Tiffany has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Registered Representative of Securities America, Inc.

Tiffany is separately licensed as a registered representative with Securities America, Inc. ("SAI") an SEC registered broker-dealer. When acting in her separate capacity as a registered representative of SAI, she may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, she may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based SAI account in addition to a Townsend advisory account.

All commissions earned for brokerage transactions are assigned to a master business account maintained by the branch office. All individuals that are registered representatives with SAI are also investment advisor representatives of Townsend. None of these individuals, including Tiffany, directly receive commissions earned for brokerage transactions. All individuals affiliated with the branch office are strictly compensated by salary, which salary is calculated based upon the value of that individual's client assets under management and does not account for brokerage commissions. Additionally, all clients served by any individual affiliated with the Townsend branch office receive financial planning services pursuant to a financial planning advisory services agreement with Townsend. As a result, any client who has a commission-based SAI account is also an advisory client of Townsend. Townsend has a fiduciary duty to act in the best interests of all advisory clients and the Townsend branch office has structured its compensation to individuals affiliated with the branch in a manner that is intended to eliminate any incentive to recommend commission-based products. Tiffany will discuss the advantages and disadvantages of establishing a fee-based account through Townsend versus establishing a commission-based account through SAI with each client. Townsend does not require its advisor representatives to encourage clients to implement investment advice through SAI.

Tiffany does not earn commissions in fee-based accounts.

Tiffany will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. Any 12b-1 fees are treated in the same manner as other brokerage compensation, and are assigned to a master business account maintained by the Townsend branch office. 12b-1 fees come from fund assets, therefore, indirectly from client assets. Typically, l 12b-1 fees are received only in commission-based brokerage accounts. However, such fees can be earned in fee-based accounts managed by Tiffany if 12b-1 fee paying mutual funds are held in the managed account. For ERISA accounts, there is an offset for any amount of 12b-1 fees. Tiffany discusses with clients the selection of a 12b-1 paying mutual fund or other trail paying mutual funds. Townsend maintains records of all 12b-1 fee payments to Tiffany which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through Townsend or SAI. However, if a client does not choose to accept Tiffany's advice or decides not to establish an account through SAI or an SAI-approved custodian, Tiffany may not be able to implement transactions for the client. Clients should understand that, due to certain regulatory constraints, Tiffany, in her capacity as a SAI registered representative must place all purchases and sales of securities products in commission-based brokerage accounts through SAI or its other approved institutions.

Insurance Agent

Townsend & Associates, Inc. doing business as Townsend is a licensed insurance entity in several states. Additionally, Tiffany is independently licensed to sell insurance and annuity products through various insurance companies as well as through Townsend & Associates as a licensed insurance entity. When acting in this capacity, she can receive commissions for selling insurance products.

Tiffany may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect her judgment when recommending products to clients. While she endeavors at all times to put the interest of her clients

first as a part of her and Townsend's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect her decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Tiffany and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

Item 5 – Additional Compensation

Other than the fees detailed in the Townsend Form ADV Part 2A Disclosure Brochure, Tiffany receives no other compensation related to advisory services provided to clients.

Item 6 – Supervision

Shawn Kelly is the Chief Compliance Officer of Townsend. He is responsible for developing, overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including Tiffany Brown. Shawn can be contacted at 303-452-5986.

Form ADV Part 2B Brochure Supplement – Andrew W. Hanna

Item 1 – Cover Page

Andrew W. Hanna
Townsend & Associates, Inc.
d/b/a Townsend
2761 W. 120th Ave., Suite 200
Westminster, CO 80234
303-452-5986

Date of Supplement: February 6, 2021

This brochure supplement provides information about Andrew W. Hanna ("Andrew") that supplements the Townsend & Associates, Inc. doing business as Townsend disclosure brochure. You should have received a copy of that brochure. Please contact Shawn Kelly at 303-452-5986 if you did not receive Townsend & Associates' brochure or if you have any questions about the contents of this supplement.

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

Item 2 – Educational Background and Business Experience

Andrew W. Hanna, Born 1979

Educational Background:
Doane College, Bachelor's in Business Administration/Management: 2002

Industry Licenses:
Series 7 (Registered Representative)
Series 66 (Uniform Combined State Law Agent)

Business Background:
Townsend & Associates, *Investment Advisor Representative*, 01/2015 to Present;
Securities America Advisors, *Investment Advisor Representative*, 01/2015 to Present;
Securities America, Inc., *Registered Representative*, 08/2014 to Present;
AMG National Trust Bank, *Banking Officer*, 01/2014 to 07/2015;
Bank of the West, *Banking Officer*, 06/2010 to 01/2014; and
US Bank, *Banking Officer*, 06/2002 to 06/2010.

Professional Designations

Andrew Hanna has the Chartered Retirement Planning Counselor℠ (CRPC®) designation.

Chartered Retirement Planning Counselor℠ (CRPC®)

Charter Retirement Planning Counselor (CRPC®); the College for Financial Planning® awards the CHARTERED RETIREMENT PLANNING COUNSELOR℠ AND CRPC® designation to students who:

- successfully complete the program;
- pass the final examination; and
- comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.

Students must sign and return the Code of Ethics forms within six months of passing the final exam. Failure to complete and submit the forms within this time frame may result in termination of the individual's candidacy. If an individual wishes to apply for authorization to use the Marks in the future, he or she may be required to fulfill the initial designation requirements in place at the time of passing the exam.

Successful students receive a certificate and are granted the right to use the designation on correspondence and business cards for a two-year period.

Continued use of the CRPC® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the CRPC® designation by:

- completing 16 hours of continuing education;
- reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct; and
- paying a biennial renewal fee of $75.

Item 3 – Disciplinary Information

Andrew has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Registered Representative of Securities America, Inc.

Andrew W. Hanna is separately licensed as a registered representative with Securities America, Inc. ("SAI") an SEC registered broker-dealer. When acting in his separate capacity as a registered representative of SAI, he may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, he may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based SAI account in addition to a Townsend advisory account.

All commissions earned for brokerage transactions are assigned to a master business account maintained by the branch office. All individuals that are registered representatives with SAI are also investment advisor representatives of Townsend. None of these individuals, including Andrew, directly receive commissions earned for brokerage transactions. All individuals affiliated with the branch office are strictly compensated by salary, which salary is calculated based upon the value of that individual's client assets under management and does not account for brokerage commissions. Additionally, all clients served by any individual affiliated with the Townsend branch office receive financial planning services pursuant to a financial planning advisory services agreement with Townsend. As a result, any client who has a commission-based SAI account is also an advisory client of Townsend. Townsend has a fiduciary duty to act in the best interests of all advisory clients and the Townsend branch office has structured its compensation to individuals affiliated with the branch in a manner that is intended to eliminate any incentive to recommend commission-based products. Andrew will discuss the advantages and disadvantages of establishing a fee-based account through Townsend versus establishing a commission-based account through SAI with each client. Townsend does not require its advisor representatives to encourage clients to implement investment advice through SAI.

Andrew does not earn commissions in fee-based accounts.

Andrew will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. Any 12b-1 fees are treated in the same manner as other brokerage compensation, and are assigned to a master business account maintained by the Townsend branch office. 12b-1 fees come from fund assets, therefore, indirectly from client assets. 12b-1 fees are received only in commission-based brokerage

accounts. Andrew discusses with clients the selection of a 12b-1 paying mutual fund or other trail paying mutual funds. Townsend maintains records of all 12b-1 fee payments to Andrew which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through Townsend or SAI. However, if a client does not choose to accept Andrew's advice or decides not to establish an account through SAI or an SAI-approved custodian, Andrew may not be able to implement transactions for the client. Clients should understand that, due to certain regulatory constraints, Andrew, in his capacity as a SAI registered representative must place all purchases and sales of securities products in commission-based brokerage accounts through SAI or its other approved institutions.

Item 5 – Additional Compensation

Mr. Hanna's annual compensation is based, in part, on the amount of assets under management that he introduces to Townsend. Accordingly, Mr. Hanna may have a conflict of interest as he may receive a one-time bonus for recommending Townsend to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client's or prospective client's best interests.

Item 6 – Supervision

Shawn Kelly is the Chief Compliance Officer of Townsend. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including Andrew W. Hanna. Shawn Kelly can be contacted at 303-452-5986.

Form ADV Part 2B Brochure Supplement – Steven K. Carlisle

Item 1 – Cover Page

Steven K. Carlisle
Townsend & Associates, Inc.
d/b/a Townsend
2761 W. 120th Ave., Suite 200
Westminster, CO 80234
303-452-5986

Date of Supplement: February 6, 2021

This brochure supplement provides information about Steven Carlisle ("Steven") that supplements the Townsend & Associates, Inc. doing business as Townsend disclosure brochure. You should have received a copy of that brochure. Please contact Shawn Kelly at 303-452-5986 if you did not receive Townsend & Associates' brochure or if you have any questions about the contents of this supplement.

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

Item 2 – Educational Background and Business Experience

Steven Carlisle, Born 1971

Educational Background:
University of Nebraska-Lincoln, Bachelor's Degree in Biology; 1994

Industry Licenses:
Series 7 (Registered Representative)
Series 66 (Uniform Combined State Law Agent)

Business Background:
Townsend & Associates, *Investment Advisor Representative*, 09/2016 to Present;
Securities America, Inc., *Registered Representative*, 09/2016 to Present;
TCM Securities, Inc., *Registered Representative*, 04/2016 to 08/2016;
Northwestern Mutual Life Insurance Company, *Agent*, 10/2014 to 04/2016;
Northwestern Mutual Investment Services LLC, *Registered Representative*, 10/2014 to 04/2016;
Sandoz, Inc., *Analytical Science and Tech Logistics Manager*, 09/2003 to 07/2014

Professional Designations

Steven Carlisle has the Chartered Retirement Planning Counselor℠ (CRPC®) designation.

Chartered Retirement Planning Counselor℠ (CRPC®)

Charter Retirement Planning Counselor (CRPC®); the College for Financial Planning® awards the CHARTERED RETIREMENT PLANNING COUNSELOR℠ AND CRPC® designation to students who:

- successfully complete the program;
- pass the final examination; and
- comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the

College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.

Students must sign and return the Code of Ethics forms within six months of passing the final exam. Failure to complete and submit the forms within this time frame may result in termination of the individual's candidacy. If an individual wishes to apply for authorization to use the Marks in the future, he or she may be required to fulfill the initial designation requirements in place at the time of passing the exam.

Successful students receive a certificate and are granted the right to use the designation on correspondence and business cards for a two-year period.

Continued use of the CRPC® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the CRPC® designation by:

- completing 16 hours of continuing education;
- reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct; and
- paying a biennial renewal fee of $75.

Item 3 – Disciplinary Information

Steven has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Registered Representative of Securities America, Inc.

Steven Carlisle is separately licensed as a registered representative with Securities America, Inc. ("SAI") an SEC registered broker-dealer. When acting in his separate capacity as a registered representative of SAI, he may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, he may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based SAI account in addition to a Townsend advisory account.
All commissions earned for brokerage transactions are assigned to a master business account maintained by the branch office. All individuals that are registered representatives with SAI are also investment advisor representatives of Townsend. None of these individuals, including Steven, directly receive commissions earned for brokerage transactions. All individuals affiliated with the branch office are strictly compensated by salary, which salary is calculated based upon the value of that individual's client assets under management and does not account for brokerage commissions. Additionally, all clients served by any individual affiliated with the Townsend branch office receive financial planning services pursuant to a financial planning advisory services agreement with Townsend. As a result, any client who has a commission-based SAI account is also an advisory client of Townsend. Townsend has a fiduciary duty to act in the best interests of all advisory clients and the Townsend branch office has structured its compensation to individuals affiliated with the branch in a manner that is intended to eliminate any incentive to recommend commission-based products. Steven will discuss the advantages and disadvantages of establishing a fee-based account through Townsend versus establishing a commission-based account through SAI with each client. Townsend does not require its advisor representatives to encourage clients to implement investment advice through SAI.

Steven does not earn commissions in fee-based accounts.

Steven will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. Any 12b-1 fees are treated in the same manner as other brokerage compensation, and are assigned to a master business account maintained by the Townsend branch office. 12b-1 fees come from fund assets,

therefore, indirectly from client assets. 12b-1 fees are received only in commission-based brokerage accounts. Steven discusses with clients the selection of a 12b-1 paying mutual fund or other trail paying mutual funds. Townsend maintains records of all 12b-1 fee payments to Steven which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through Townsend or SAI. However, if a client does not choose to accept Steven's advice or decides not to establish an account through SAI or an SAI-approved custodian, Steven may not be able to implement transactions for the client. Clients should understand that, due to certain regulatory constraints, Steven, in his capacity as a SAI registered representative must place all purchases and sales of securities products in commission-based brokerage accounts through SAI or its other approved institutions.

Insurance Agent

Townsend & Associates, Inc. doing business as Townsend is a licensed insurance entity in several states. Additionally, Steven is independently licensed to sell insurance and annuity products through various insurance companies as well as through Townsend & Associates as a licensed insurance entity. When acting in this capacity, he can receive commissions for selling insurance products.

Steven may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect his judgment when recommending products to clients. While he endeavors at all times to put the interest of his clients first as a part of his and Townsend's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect his decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Steven and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

Item 5 – Additional Compensation

Mr. Carlisle's' annual compensation is based, in part, on the amount of assets under management that he introduces to Townsend. Accordingly, Mr. Carlisle may have a conflict of interest as he may receive a one-time bonus for recommending Townsend to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client's or prospective client's best interests.

Item 6 – Supervision

Shawn Kelly is the Chief Compliance Officer of Townsend. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including Steven Carlisle. Shawn Kelly can be contacted at 303-452-5986.

Form ADV Part 2B Brochure Supplement – Christine White

Item 1 – Cover Page

Christine White
Townsend & Associates, Inc.
d/b/a Townsend
2761 W. 120th Ave., Suite 200
Westminster, CO 80234
Ph: 303-452-5986

Date of Supplement: February 6, 2021

This brochure supplement provides information about Christine White that supplements the Townsend & Associates Inc. doing business as Townsend brochure. You should have received a copy of that brochure. Please contact Shawn Kelly at 303-452-5986 if you did not receive the Townsend brochure or if you have any questions about the contents of this supplement.

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

Item 2 – Educational Background and Business Experience

Christine White, Born 1988

Education Background:
Temple University, Bachelor's Degree in Health & Exercise Science
Temple University, Master of Science Degree in Kinesiology

Industry Licenses:
Series 7 (Registered Representative)
Series 66 (Uniform Combined State Law Agent)

Business Experience:
Townsend & Associates, Inc., *Financial Planner*, 12/2016 to Present;
Townsend & Associates, Inc., *Registered Office Assistant*, 01/2016 to 12/2016;
Securities America, Inc., *Registered Representative*, 12/2016 to Present;
1847 Financial, *Advisor*, 12/2014 to 12/2015;
Penn Mutual, *Agent*, 12/2014 to 12/2015;
HTK, *Registered Broker,* 12/2014 to 12/2015; and
VIDA Fitness, *Instructor/Personal Training Manager*, 11/2012 to 11/2014

Professional Designations:

Christine White has the Certified Financial Planner™ (CFP®) designation.

Certified Financial Planner
Certified Financial Planner Board of Standards, Inc. ("CFP Board") owns the CFP® certification mark, the CERTIFIED FINANCIAL PLANNER™ certification mark, and the CFP® certification mark (with flame design) logo in the United States (these marks are collectively referred to as the "CFP® marks"). The CFP Board authorizes use of the CFP® marks by individuals who successfully complete the CFP Board's initial and ongoing certification requirements.

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. Currently, more than 87,000 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 a 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 or an accepted equivalent, including completion of a financial plan development capstone course, and attain a Bachelor's Degree from an accredited college or university. CFP Board's financial planning subject areas include professional conduct and regulation, general principles of financial planning, education planning, risk management and insurance planning, investment planning, income tax planning, retirement savings and income planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, 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 – CFP Board requires 6,000 hours of experience through the Standard Pathway, or 4,000 hours of experience through the Apprenticeship Pathway that meets additional requirements ; and

- Ethics – Agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct*, which put clients' interest first; acknowledge CFP Board's right to enforce them through its *Disciplinary Rules and Procedures;* comply with the *Financial Planning Practice Standards* which determine what clients should reasonably expect from the financial planning engagement and complete a CFP® Certification Application which requires disclosure of an individual's background, including involvement in any criminal, civil, governmental, or self-regulatory agency proceeding or inquiry, bankruptcy, customer complaint, filing, termination/internal reviews conducted by the individual's employer or firm.

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 accepted by the CFP Board 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 – CFP® professionals agree to adhere to the high standards of ethics and practice outlined in CFP Board's Code of Ethics and Standards of Conduct and to acknowledge CFP Board's right to enforce them through its Disciplinary Rules and Procedures. The Code of Ethics and Standards of Conduct require that CFP Professionals provide financial planning services in the best interests of their clients.

- Certification Application – Properly complete a Certification Application to (i) acknowledge voluntary adherence to the terms and conditions of certification with CFP Board and (ii) disclose any involvement in criminal and civil proceedings, inquiries or investigations, bankruptcy filings, internal reviews and customer complaints.

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.

You may verify an individual's CFP® certification and background through the CFP Board. The verification function will allow you to verify an individual's certification status, CFP Board's disciplinary history and any bankruptcy disclosures in the past ten years. Additional regulatory information may also be found through FINRA'S BrokerCheck and the SEC's Investment Adviser Public Disclosure databases, which are free tools that may be used to conduct research on the background and experience of CFP® professionals and those who held CFP® certification at one time, including with respect to employment history, regulatory actions, and investment-related licensing information, arbitrations, and complaints.

CFP Acknowledgment: Christine acknowledges her responsibility as a CFP® Professional to adhere to the standards that have been established in the CFP Board's Standards of Professional Conduct. If you become aware that her conduct may violate the Standards of Professional Conduct, you may file a complaint with the CFP Board at www.CFP.net/complaint.

Item 3 – Disciplinary Information

Christine has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Registered Representative of Securities America, Inc.

Christine is separately licensed as a registered representative with Securities America, Inc. ("SAI") an SEC registered broker-dealer. When acting in her separate capacity as a registered representative of SAI, she may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, she may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based SAI account in addition to a Townsend advisory account.

All commissions earned for brokerage transactions are assigned to a master business account maintained by the branch office. All individuals that are registered representatives with SAI are also investment advisor representatives of Townsend. None of these individuals, including Christine, directly receive commissions earned for brokerage transactions. All individuals affiliated with the branch office are strictly compensated by salary, which salary is calculated based upon the value of that individual's client assets under management and does not account for brokerage commissions. Additionally, all clients served by any individual affiliated with the Townsend branch office receive financial planning services pursuant to a financial planning advisory services agreement with Townsend. As a result, any client who has a commission-based SAI account is also an advisory client of Townsend. Townsend has a fiduciary duty to act in the best interests of all advisory clients and the Townsend branch office has structured its compensation to individuals affiliated with the branch in a manner that is intended to eliminate any incentive to recommend commission-based products. Christine will discuss the advantages and disadvantages of establishing a fee-based account through Townsend versus establishing a commission-based account through SAI with each client. Townsend does not require its advisor representatives to encourage clients to implement investment advice through SAI.

Christine does not earn commissions in fee-based accounts.

Christine will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. Any 12b-1 fees are treated in the same manner as other brokerage compensation, and are assigned to a master business account maintained by the Townsend branch office. 12b-1 fees come from fund assets, therefore, indirectly from client assets. Typically, 12b-1 fees are received only in commission-based brokerage accounts. However, such fees can be earned in fee-based accounts managed by Christine if 12b-1 fee paying mutual funds are held in the managed account. For ERISA accounts, there is an offset

for any amount of 12b-1 fees. Christine discusses with clients the selection of a 12b-1 paying mutual fund or other trail paying mutual funds. Townsend maintains records of all 12b-1 fee payments to Christine which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through Townsend or SAI. However, if a client does not choose to accept Christine's advice or decides not to establish an account through SAI or an SAI-approved custodian, Christine may not be able to implement transactions for the client. Clients should understand that, due to certain regulatory constraints, Christine, in her capacity as a SAI registered representative must place all purchases and sales of securities products in commission-based brokerage accounts through SAI or its other approved institutions.

Insurance Agent

Townsend & Associates, Inc. doing business as Townsend is a licensed insurance entity in several states. Additionally, Christine is independently licensed to sell insurance and annuity products through various insurance companies as well as through Townsend & Associates as a licensed insurance entity. When acting in this capacity, she can receive commissions for selling insurance products.

Christine may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect her judgment when recommending products to clients. While she endeavors at all times to put the interest of her clients first as a part of her and Townsend' overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect her decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Christine and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

Item 5 – Additional Compensation

Other than the fees detailed in the Townsend Form ADV Part 2A Disclosure Brochure, Christine receives no other compensation related to advisory services provided to clients.

Item 6 – Supervision

Shawn Kelly is the Chief Compliance Officer of Townsend. He is responsible for developing, overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including Christine White. Shawn can be contacted at 303-452-5986.

Form ADV Part 2B Brochure Supplement – Antwann J. Holmes

Item 1 – Cover Page

Antwann J. Holmes
Townsend & Associates, Inc.
d/b/a Townsend
2761 W. 120th Ave., Suite 200
Westminster, CO 80234
Ph: 303-452-5986

Date of Supplement: February 6, 2021

This brochure supplement provides information about Antwann J. Holmes ("Antwann") that supplements the Townsend & Associates Inc. doing business as Townsend brochure. You should have received a copy of that brochure. Please contact Shawn Kelly at 303-452-5986 if you did not receive the Townsend brochure or if you have any questions about the contents of this supplement.

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

Item 2 – Educational Background and Business Experience

Antwann J. Holmes, Born 1982

Educational Background:
Arizona State University, Bachelor's Degree in Global Business Management & Leadership

Industry Licenses:
Series 7 (Registered Representative)
Series 66 (Uniform Combined State Law Agent)

Business Experience:
Townsend & Associates, Inc., *Financial Planner*, 11/2016 to Present;
Securities America Inc., *Registered Representative*, 12/2016 to Present.
Personal Capital Advisors Corporation, *Advisor*, 03/2015 to 11/2016
PriceWaterhouseCoopers, *Associate*, 12/2008 to 02/2015

Professional Designations:

Antwann has the Certified Financial Planner™ (CFP®) designation.

Certified Financial Planner

Certified Financial Planner Board of Standards, Inc. ("CFP Board") owns the CFP® certification mark, the CERTIFIED FINANCIAL PLANNER™ certification mark, and the CFP® certification mark (with flame design) logo in the United States (these marks are collectively referred to as the "CFP® marks"). The CFP

Board authorizes use of the CFP® marks by individuals who successfully complete the CFP Board's initial and ongoing certification requirements.

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. Currently, more than 87,000 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 a 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 or an accepted equivalent, including completion of a financial plan development capstone course, and attain a Bachelor's Degree from an accredited college or university. CFP Board's financial planning subject areas include professional conduct and regulation, general principles of financial planning, education planning, risk management and insurance planning, investment planning, income tax planning, retirement savings and income planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, 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 – CFP Board requires 6,000 hours of experience through the Standard Pathway, or 4,000 hours of experience through the Apprenticeship Pathway that meets additional requirements ; and

- Ethics – Agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct*, which put clients' interest first; acknowledge CFP Board's right to enforce them through its *Disciplinary Rules and Procedures;* comply with the *Financial Planning Practice Standards* which determine what clients should reasonably expect from the financial planning engagement and complete a CFP® Certification Application which requires disclosure of an individual's background, including involvement in any criminal, civil, governmental, or self-regulatory agency proceeding or inquiry, bankruptcy, customer complaint, filing, termination/internal reviews conducted by the individual's employer or firm.

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 accepted by the CFP Board 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 – CFP® professionals agree to adhere to the high standards of ethics and practice outlined in CFP Board's Code of Ethics and Standards of Conduct and to acknowledge CFP Board's right to enforce them through its Disciplinary Rules and Procedures. The Code of Ethics and Standards of Conduct require that CFP Professionals provide financial planning services in the best interests of their clients.

- Certification Application – Properly complete a Certification Application to (i) acknowledge voluntary adherence to the terms and conditions of certification with CFP Board and (ii) disclose any

involvement in criminal and civil proceedings, inquiries or investigations, bankruptcy filings, internal reviews and customer complaints.

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.

You may verify an individual's CFP® certification and background through the CFP Board. The verification function will allow you to verify an individual's certification status, CFP Board's disciplinary history and any bankruptcy disclosures in the past ten years. Additional regulatory information may also be found through FINRA'S BrokerCheck and the SEC's Investment Adviser Public Disclosure databases, which are free tools that may be used to conduct research on the background and experience of CFP® professionals and those who held CFP® certification at one time, including with respect to employment history, regulatory actions, and investment-related licensing information, arbitrations, and complaints.

CFP Acknowledgment: Antwann acknowledges his responsibility as a CFP® Professional to adhere to the standards that have been established in the CFP Board's Standards of Professional Conduct. If you become aware that his conduct may violate the Standards of Professional Conduct, you may file a complaint with the CFP Board at www.CFP.net/complaint.

Item 3 – Disciplinary Information

Antwann has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Registered Representative of Securities America, Inc.

Antwann is separately licensed as a registered representative with Securities America, Inc. ("SAI") an SEC registered broker-dealer. When acting in his separate capacity as a registered representative of SAI, he may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, he may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based SAI account in addition to a Townsend advisory account.

All commissions earned for brokerage transactions are assigned to a master business account maintained by the branch office. All individuals that are registered representatives with SAI are also investment advisor representatives of Townsend. None of these individuals, including Antwann, directly receive commissions earned for brokerage transactions. All individuals affiliated with the branch office are strictly compensated by salary, which salary is calculated based upon the value of that individual's client assets under management and does not account for brokerage commissions. Additionally, all clients served by any individual affiliated with the Townsend branch office receive financial planning services pursuant to a financial planning advisory services agreement with Townsend. As a result, any client who has a commission-based SAI account is also an advisory client of Townsend. Townsend has a fiduciary duty to act in the best interests of all advisory clients and the Townsend branch office has structured its compensation to individuals affiliated with the branch in a manner that is intended to eliminate any incentive to recommend commission-based products. Antwann will discuss the advantages and disadvantages of establishing a fee-based account through Townsend versus establishing a commission-based account through SAI with each client. Townsend does not require its advisor representatives to encourage clients to implement investment advice through SAI.

Antwann does not earn commissions in fee-based accounts.

Antwann will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. Any 12b-1 fees are treated in the same manner as other brokerage compensation, and are assigned to a master business account maintained by the Townsend branch office. 12b-1 fees come from fund assets, therefore, indirectly from client assets. 12b-1 fees are received only in commission-based brokerage accounts. Antwann discusses with clients the selection of a 12b-1 paying mutual fund or other trail paying mutual funds. Townsend maintains records of all 12b-1 fee payments to Antwann which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through Townsend or SAI. However, if a client does not choose to accept Antwann's advice or decides not to establish an account through SAI or an SAI-approved custodian, Antwann may not be able to implement transactions for the client. Clients should understand that, due to certain regulatory constraints, Antwann, in his capacity as a SAI registered representative must place all purchases and sales of securities products in commission-based brokerage accounts through SAI or its other approved institutions.

Item 5 – Additional Compensation

Other than the fees detailed in the Townsend Form ADV Part 2A Disclosure Brochure, Antwann receives no other compensation related to advisory services provided to clients.

Item 6 – Supervision

Shawn Kelly is the Chief Compliance Officer of Townsend. Shawn is responsible for developing, overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including Antwann **J.** Holmes. Shawn can be contacted at 303-452-5986.

Form ADV Part 2B Brochure Supplement – Derek S. Cheshire

Item 1 – Cover Page

Derek S. Cheshire
Townsend & Associates, Inc.
d/b/a Townsend
2761 W. 120th Ave., Suite 200
Westminster, CO 80234
Ph: 303-452-5986

Date of Supplement: February 6, 2021

This brochure supplement provides information about Derek S. Cheshire ("Derek") that supplements the Townsend & Associates Inc. doing business as Townsend brochure. You should have received a copy of that brochure. Please contact Shawn Kelly at 303-452-5986 if you did not receive the Townsend brochure or if you have any questions about the contents of this supplement.

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

Item 2 – Educational Background and Business Experience

Derek S. Cheshire, Born 1979

Education Background:
New Mexico State University, Bachelor's Degree in Finance
University of Colorado at Denver, Master of Business Administration Degree

Industry Licenses:
Series 7 (Registered Representative)
Series 66 (Uniform Combined State Law Agent)

Business Background:
Townsend & Associates, Inc., *Investment Advisor Representative*, 02/2019 to Present
US Bancorp Investments, *Wealth Management Advisor*, 04/2017 to 02/2019;
Ethos Financial Partners, *Associate Financial Advisor,* 03/2013 to 03/2017

Professional Designation:

Derek Cheshire holds the following professional designations:

1. Accredit Portfolio Management Advisor (APMA℠)
2. Certified Financial Planner™ (CFP®)

Accredited Portfolio Management Advisor℠ (APMA℠)

Individuals who hold the APMA℠ designation have completed a course of study encompassing client assessment and suitability, risk/return, investment objectives, bond and equity portfolios, modern portfolio theory and investor psychology. Students have hands-on practice in analyzing investment policy statements, building portfolios, and making asset allocation decisions including sell, hold, and buy decisions within a client's portfolio. The program consists of two parts designed for a total of approximately 120-150 hours of study. The first part includes an 11 module self-study course with an online, proctored exam. Students successfully completing the exam matriculate to the second part of the program. That part consists of a four week, instructor-led, online graduate course requiring successful completion of several graded

assignments involving investor policy statements, portfolio construction, asset allocation, and portfolio buy, sell, and hold decisions. The program must be completed within one year from enrollment.

Certified Financial Planner™ (CFP®)

Certified Financial Planner Board of Standards, Inc. ("CFP Board") owns the CFP® certification mark, the CERTIFIED FINANCIAL PLANNER™ certification mark, and the CFP® certification mark (with flame design) logo in the United States (these marks are collectively referred to as the "CFP® marks"). The CFP Board authorizes use of the CFP® marks by individuals who successfully complete the CFP Board's initial and ongoing certification requirements.

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. Currently, more than 87,000 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 a 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 or an accepted equivalent, including completion of a financial plan development capstone course, and attain a Bachelor's Degree from an accredited college or university. CFP Board's financial planning subject areas include professional conduct and regulation, general principles of financial planning, education planning, risk management and insurance planning, investment planning, income tax planning, retirement savings and income planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, 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 – CFP Board requires 6,000 hours of experience through the Standard Pathway, or 4,000 hours of experience through the Apprenticeship Pathway that meets additional requirements ; and

- Ethics – Agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct*, which put clients' interest first; acknowledge CFP Board's right to enforce them through its *Disciplinary Rules and Procedures;* comply with the *Financial Planning Practice Standards* which determine what clients should reasonably expect from the financial planning engagement and complete a CFP® Certification Application which requires disclosure of an individual's background, including involvement in any criminal, civil, governmental, or self-regulatory agency proceeding or inquiry, bankruptcy, customer complaint, filing, termination/internal reviews conducted by the individual's employer or firm.

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 accepted by the CFP Board 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 – CFP® professionals agree to adhere to the high standards of ethics and practice outlined in CFP Board's Code of Ethics and Standards of Conduct and to acknowledge CFP Board's right to enforce them through its Disciplinary Rules and Procedures. The Code of Ethics and Standards of Conduct require that CFP Professionals provide financial planning services in the best interests of their clients.

- Certification Application – Properly complete a Certification Application to (i) acknowledge voluntary adherence to the terms and conditions of certification with CFP Board and (ii) disclose any involvement in criminal and civil proceedings, inquiries or investigations, bankruptcy filings, internal reviews and customer complaints.

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.

You may verify an individual's CFP® certification and background through the CFP Board. The verification function will allow you to verify an individual's certification status, CFP Board's disciplinary history and any bankruptcy disclosures in the past ten years. Additional regulatory information may also be found through FINRA'S BrokerCheck and the SEC's Investment Adviser Public Disclosure databases, which are free tools that may be used to conduct research on the background and experience of CFP® professionals and those who held CFP® certification at one time, including with respect to employment history, regulatory actions, and investment-related licensing information, arbitrations, and complaints.

CFP Acknowledgment: Derek acknowledges his responsibility as a CFP® Professional to adhere to the standards that have been established in the CFP Board's Standards of Professional Conduct. If you become aware that his conduct may violate the Standards of Professional Conduct, you may file a complaint with the CFP Board at www.CFP.net/complaint.

Item 3 – Disciplinary Information

Derek Cheshire has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Registered Representative of Securities America, Inc.

Derek is separately licensed as a registered representative with Securities America, Inc. ("SAI") an SEC registered broker-dealer. When acting in his separate capacity as a registered representative of SAI, he may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, he may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based SAI account in addition to a Townsend advisory account.

All commissions earned for brokerage transactions are assigned to a master business account maintained by the branch office. All individuals that are registered representatives with SAI are also investment advisor representatives of Townsend. None of these individuals, including Derek, directly receive commissions earned for brokerage transactions. All individuals affiliated with the branch office are strictly compensated by salary, which salary is calculated based upon the value of that individual's client assets under management and does not account for brokerage commissions. Additionally, all clients served by any individual affiliated with the Townsend branch office receive financial planning services pursuant to a financial planning advisory services agreement with Townsend. As a result, any client who has a commission-based SAI account is also an advisory client of Townsend. Townsend has a fiduciary duty to act in the best interests of all advisory clients and the Townsend branch office has structured its compensation to individuals affiliated with the branch in a manner that is intended to eliminate any incentive to recommend commission-based products. Derek will discuss the advantages and disadvantages of establishing a fee-based account through Townsend versus establishing a commission-based account

through SAI with each client. Townsend does not require its advisor representatives to encourage clients to implement investment advice through SAI.

Derek does not earn commissions in fee-based accounts.

Derek will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. Any 12b-1 fees are treated in the same manner as other brokerage compensation, and are assigned to a master business account maintained by the Townsend branch office. 12b-1 fees come from fund assets, therefore, indirectly from client assets. 12b-1 fees are received only in commission-based brokerage accounts. Derek discusses with clients the selection of a 12b-1 paying mutual fund or other trail paying mutual funds. Townsend maintains records of all 12b-1 fee payments to Derek which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through Townsend or SAI. However, if a client does not choose to accept Derek's advice or decides not to establish an account through SAI or an SAI-approved custodian, Derek may not be able to implement transactions for the client. Clients should understand that, due to certain regulatory constraints, Derek, in his capacity as a SAI registered representative must place all purchases and sales of securities products in commission-based brokerage accounts through SAI or its other approved institutions.

Insurance Agent

Townsend & Associates, Inc. doing business as Townsend is a licensed insurance entity in several states. Additionally, Derek is independently licensed to sell insurance and annuity products through various insurance companies as well as through Townsend & Associates as a licensed insurance entity. When acting in this capacity, he can receive commissions for selling insurance products.

Derek may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect his judgment when recommending products to clients. While he endeavors at all times to put the interest of his clients first as a part of his and Townsend's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect his decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Derek and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

Item 5 – Additional Compensation

Other than the fees detailed in the Townsend Form ADV Part 2A Disclosure Brochure, Derek receives no other compensation related to advisory services provided to clients.

Item 6 – Supervision

Shawn Kelly is the Chief Compliance Officer of Townsend. He is responsible for developing, overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including Derek Cheshire. Shawn can be contacted at 303-452-5986.

Form ADV Part 2B Brochure Supplement – Richard Harrison

Item 1 – Cover Page

Richard Harrison
Townsend & Associates, Inc.
d/b/a Townsend
2761 W. 120th Ave., Suite 200
Westminster, CO 80234
Ph: 303-452-5986

Date of Supplement: February 6, 2021

This brochure supplement provides information about Richard Harrison ("Richard") that supplements the Townsend & Associates Inc. doing business as Townsend brochure. You should have received a copy of that brochure. Please contact Shawn Kelly at 303-452-5986 if you did not receive the Townsend brochure or if you have any questions about the contents of this supplement.

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

Item 2 – Educational Background and Business Experience

Richard Harrison, Born 1986

Education Background:
University of Idaho, Bachelor's Degree in Business Finance and Economics

Industry Licenses:
Series 7 (Registered Representative)
Series 66 (Uniform Combined State Law Agent)

Business Background:
Townsend & Associates, Inc., *Investment Advisor Representative*, 04/2019 to Present
Securities America, Inc., *Registered Representative*, 04/2019 to Present;
TIAA-CREF, *Wealth Management Advisor*, 07/2014 to 03/2019
USAA, *Financial Advisor*, 11/2012 to 07/2014

Professional Designation:

Richard Harrison has the Certified Financial Planner™ (CFP®) designation.

Certified Financial Planner™ (CFP®)

Certified Financial Planner Board of Standards, Inc. ("CFP Board") owns the CFP® certification mark, the CERTIFIED FINANCIAL PLANNER™ certification mark, and the CFP® certification mark (with flame design) logo in the United States (these marks are collectively referred to as the "CFP® marks"). The CFP Board authorizes use of the CFP® marks by individuals who successfully complete the CFP Board's initial and ongoing certification requirements.

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. Currently, more than 87,000 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 a 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 or an accepted equivalent, including completion of a financial plan development capstone course, and attain a Bachelor's Degree from an accredited college or university. CFP Board's financial planning subject areas include professional conduct and regulation, general principles of financial planning, education planning, risk management and insurance planning, investment planning, income tax planning, retirement savings and income planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, 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 – CFP Board requires 6,000 hours of experience through the Standard Pathway, or 4,000 hours of experience through the Apprenticeship Pathway that meets additional requirements; and

- Ethics – Agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct*, which put clients' interest first; acknowledge CFP Board's right to enforce them through its *Disciplinary Rules and Procedures;* comply with the *Financial Planning Practice Standards* which determine what clients should reasonably expect from the financial planning engagement and complete a CFP® Certification Application which requires disclosure of an individual's background, including involvement in any criminal, civil, governmental, or self-regulatory agency proceeding or inquiry, bankruptcy, customer complaint, filing, termination/internal reviews conducted by the individual's employer or firm.

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 accepted by the CFP Board 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 – CFP® professionals agree to adhere to the high standards of ethics and practice outlined in CFP Board's Code of Ethics and Standards of Conduct and to acknowledge CFP Board's right to enforce them through its Disciplinary Rules and Procedures. The Code of Ethics and Standards of Conduct require that CFP Professionals provide financial planning services in the best interests of their clients.

- Certification Application – Properly complete a Certification Application to (i) acknowledge voluntary adherence to the terms and conditions of certification with CFP Board and (ii) disclose any involvement in criminal and civil proceedings, inquiries or investigations, bankruptcy filings, internal reviews and customer complaints.

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.

You may verify an individual's CFP® certification and background through the CFP Board. The verification function will allow you to verify an individual's certification status, CFP Board's disciplinary history and any

bankruptcy disclosures in the past ten years. Additional regulatory information may also be found through FINRA'S BrokerCheck and the SEC's Investment Adviser Public Disclosure databases, which are free tools that may be used to conduct research on the background and experience of CFP® professionals and those who held CFP® certification at one time, including with respect to employment history, regulatory actions, and investment-related licensing information, arbitrations, and complaints.

CFP Acknowledgment: Richard acknowledges his responsibility as a CFP® Professional to adhere to the standards that have been established in the CFP Board's Standards of Professional Conduct. If you become aware that his conduct may violate the Standards of Professional Conduct, you may file a complaint with the CFP Board at www.CFP.net/complaint.

Item 3 – Disciplinary Information

Richard Harrison has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Registered Representative of Securities America, Inc.

Richard is separately licensed as a registered representative with Securities America, Inc. ("SAI") an SEC registered broker-dealer. When acting in his separate capacity as a registered representative of SAI, he may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, he may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based SAI account in addition to a Townsend advisory account.

All commissions earned for brokerage transactions are assigned to a master business account maintained by the branch office. All individuals that are registered representatives with SAI are also investment advisor representatives of Townsend. None of these individuals, including Richard, directly receive commissions earned for brokerage transactions. All individuals affiliated with the branch office are strictly compensated by salary, which salary is calculated based upon the value of that individual's client assets under management and does not account for brokerage commissions. Additionally, all clients served by any individual affiliated with the Townsend branch office receive financial planning services pursuant to a financial planning advisory services agreement with Townsend. As a result, any client who has a commission-based SAI account is also an advisory client of Townsend. Townsend has a fiduciary duty to act in the best interests of all advisory clients and the Townsend branch office has structured its compensation to individuals affiliated with the branch in a manner that is intended to eliminate any incentive to recommend commission-based products. Richard will discuss the advantages and disadvantages of establishing a fee-based account through Townsend versus establishing a commission-based account through SAI with each client. Townsend does not require its advisor representatives to encourage clients to implement investment advice through SAI.

Richard does not earn commissions in fee-based accounts.

Richard will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. Any 12b-1 fees are treated in the same manner as other brokerage compensation, and are assigned to a master business account maintained by the Townsend branch office. 12b-1 fees come from fund assets, therefore, indirectly from client assets. 12b-1 fees are received only in commission-based brokerage accounts. Richard discusses with clients the selection of a 12b-1 paying mutual fund or other trail paying mutual funds. Townsend maintains records of all 12b-1 fee payments to Richard which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through Townsend or SAI. However, if a client does not choose to accept Richard's advice or decides not to establish an account through SAI or an SAI-approved custodian, Richard may not be able to implement transactions for the client. Clients should understand that, due to certain regulatory constraints, Richard, in his capacity as a SAI registered

representative must place all purchases and sales of securities products in commission-based brokerage accounts through SAI or its other approved institutions.

Insurance Agent

Townsend & Associates, Inc. doing business as Townsend is a licensed insurance entity in several states. Additionally, Richard is independently licensed to sell insurance and annuity products through various insurance companies as well as through Townsend & Associates as a licensed insurance entity. When acting in this capacity, he can receive commissions for selling insurance products.

Richard may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect his judgment when recommending products to clients. While he endeavors at all times to put the interest of his clients first as a part of his and Townsend's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect his decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Richard and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

Item 5 – Additional Compensation

Mr. Hanna's annual compensation is based, in part, on the amount of assets under management that he introduces to Townsend. Accordingly, Mr. Hanna may have a conflict of interest as he may receive a one-time bonus for recommending Townsend to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client's or prospective client's best interests.

Item 6 – Supervision

Shawn Kelly is the Chief Compliance Officer of Townsend. He is responsible for developing, overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including Richard Harrison. Shawn can be contacted at 303-452-5986.

Form ADV Part 2B Brochure Supplement – Jonathan Amick

Item 1 – Cover Page

Jonathan Amick
Townsend & Associates, Inc.
d/b/a Townsend
2761 W. 120th Ave., Suite 200
Westminster, CO 80234
Ph: 303-452-5986

Date of Supplement: February 6, 2021

This brochure supplement provides information about Jonathan Amick ("Jonathan") that supplements the Townsend & Associates Inc. doing business as Townsend brochure. You should have received a copy of that brochure. Please contact Shawn Kelly at 303-452-5986 if you did not receive the Townsend brochure or if you have any questions about the contents of this supplement.

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

Item 2 – Educational Background and Business Experience

Jonathan Amick, Born 1984

Education Background:
Metropolitan State University, Bachelor's Degree in Business Administration

Industry Licenses:
None.

Business Background:
Townsend & Associates, Inc., *Financial Planner*, 07/2019 to Present
Jonny Moneyseed, *Consultant*, 10/2016 to 07/2019
Zions Bancorporation, *Assistant Vice President, Wealth Planning Analyst*, 05/2011 to 10/2016

Professional Designation:

Jonathan Amick has the Certified Financial Planner™ (CFP®) designation.

Certified Financial Planner™ (CFP®)

Certified Financial Planner Board of Standards, Inc. ("CFP Board") owns the CFP® certification mark, the CERTIFIED FINANCIAL PLANNER™ certification mark, and the CFP® certification mark (with flame design) logo in the United States (these marks are collectively referred to as the "CFP® marks"). The CFP Board authorizes use of the CFP® marks by individuals who successfully complete the CFP Board's initial and ongoing certification requirements.

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. Currently, more than 87,000 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 a 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 or an accepted equivalent, including completion of a financial plan development capstone course, and attain a Bachelor's Degree from an accredited college or university. CFP Board's financial planning subject areas include professional conduct and regulation, general principles of financial planning, education planning, risk management and insurance planning, investment planning, income tax planning, retirement savings and income planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, 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 – CFP Board requires 6,000 hours of experience through the Standard Pathway, or 4,000 hours of experience through the Apprenticeship Pathway that meets additional requirements ; and

- Ethics – Agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct*, which put clients' interest first; acknowledge CFP Board's right to enforce them through its *Disciplinary Rules and Procedures;* comply with the *Financial Planning Practice Standards* which determine what clients should reasonably expect from the financial planning engagement and complete a CFP® Certification Application which requires disclosure of an individual's background, including involvement in any criminal, civil, governmental, or self-regulatory agency proceeding or inquiry, bankruptcy, customer complaint, filing, termination/internal reviews conducted by the individual's employer or firm.

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 accepted by the CFP Board 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 – CFP® professionals agree to adhere to the high standards of ethics and practice outlined in CFP Board's Code of Ethics and Standards of Conduct and to acknowledge CFP Board's right to enforce them through its Disciplinary Rules and Procedures. The Code of Ethics and Standards of Conduct require that CFP Professionals provide financial planning services in the best interests of their clients.

- Certification Application – Properly complete a Certification Application to (i) acknowledge voluntary adherence to the terms and conditions of certification with CFP Board and (ii) disclose any involvement in criminal and civil proceedings, inquiries or investigations, bankruptcy filings, internal reviews and customer complaints.

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.

You may verify an individual's CFP® certification and background through the CFP Board. The verification function will allow you to verify an individual's certification status, CFP Board's disciplinary history and any bankruptcy disclosures in the past ten years. Additional regulatory information may

also be found through FINRA'S BrokerCheck and the SEC's Investment Adviser Public Disclosure databases, which are free tools that may be used to conduct research on the background and experience of CFP® professionals and those who held CFP® certification at one time, including with respect to employment history, regulatory actions, and investment-related licensing information, arbitrations, and complaints.

CFP Acknowledgment: Jonathan acknowledges his responsibility as a CFP® Professional to adhere to the standards that have been established in the CFP Board's Standards of Professional Conduct. If you become aware that his conduct may violate the Standards of Professional Conduct, you may file a complaint with the CFP Board at www.CFP.net/complaint.

Item 3 – Disciplinary Information

Jonathan Amick has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Insurance Agent

Townsend & Associates, Inc. doing business as Townsend is a licensed insurance entity in several states. Additionally, Jonathan is independently licensed to sell insurance and annuity products through various insurance companies as well as through Townsend & Associates as a licensed insurance entity. When acting in this capacity, he can receive commissions for selling insurance products.

Jonathan may also receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits may affect his judgment when recommending products to clients. While he endeavors at all times to put the interest of his clients first as a part of his and Townsend's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest, and may affect his decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through Jonathan and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

Item 5 – Additional Compensation

Other than the fees detailed in the Townsend Form ADV Part 2A Disclosure Brochure, Jonathan receives no other compensation related to advisory services provided to clients.

Item 6 – Supervision

Shawn Kelly is the Chief Compliance Officer of Townsend. He is responsible for developing, overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including Jonathan Amick. Shawn can be contacted at 303-452-5986.

Form ADV Part 2B Brochure Supplement – Kaitlin E. Bell

Item 1 – Cover Page

Kaitlin E. Bell
Townsend & Associates, Inc.
d/b/a Townsend
2761 W. 120th Ave., Suite 200
Westminster, CO 80234
Ph: 303-452-5986

Date of Supplement: February 6, 2021

This brochure supplement provides information about Kaitlin E. Bell ("Kaitlin") that supplements the Townsend & Associates Inc. doing business as Townsend brochure. You should have received a copy of that brochure. Please contact Shawn Kelly at 303-452-5986 if you did not receive the Townsend brochure or if you have any questions about the contents of this supplement.

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

Item 2 – Educational Background and Business Experience

Kaitlin E. Bell, Born 1986

Education Background:

Colorado State University, Bachelor's Degree in Business Finance with a concentration in Investment Analysis

Industry Licenses:

Series 7 (Registered Representative)
Series 9 (General Securities Sales Supervisor)
Series 10 (General Securities Sales Supervisor)
Series 63 (Securities Agent State Law)
Series 66 (Uniform Combined State Law Agent)

Business Background:

Townsend & Associates, Inc., *Client Services*, 02/2017 to Present
Securities America, Inc., *Registered Representative*, 03/2017 to Present
Charles Schwab & Co., Inc., *Senior Specialist Trading Operations*, 08/2012 to 02/2017

Professional Designation:

Kaitlin E. Bell has the Certified Financial Planner™ (CFP®) designation.

Certified Financial Planner™ (CFP®)

Certified Financial Planner Board of Standards, Inc. ("CFP Board") owns the CFP® certification mark, the CERTIFIED FINANCIAL PLANNER™ certification mark, and the CFP® certification mark (with flame design) logo in the United States (these marks are collectively referred to as the "CFP® marks"). The CFP Board authorizes use of the CFP® marks by individuals who successfully complete the CFP Board's initial and ongoing certification requirements.

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. Currently, more than 87,000 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 a 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 or an accepted equivalent, including completion of a financial plan development capstone course, and attain a Bachelor's Degree from an accredited college or university. CFP Board's financial planning subject areas include professional conduct and regulation, general principles of financial planning, education planning, risk management and insurance planning, investment planning, income tax planning, retirement savings and income planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, 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 – CFP Board requires 6,000 hours of experience through the Standard Pathway, or 4,000 hours of experience through the Apprenticeship Pathway that meets additional requirements ; and

- Ethics – Agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct*, which put clients' interest first; acknowledge CFP Board's right to enforce them through its *Disciplinary Rules and Procedures;* comply with the *Financial Planning Practice Standards* which determine what clients should reasonably expect from the financial planning engagement and complete a CFP® Certification Application which requires disclosure of an individual's background, including involvement in any criminal, civil, governmental, or self-regulatory agency proceeding or inquiry, bankruptcy, customer complaint, filing, termination/internal reviews conducted by the individual's employer or firm.

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 accepted by the CFP Board 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 – CFP® professionals agree to adhere to the high standards of ethics and practice outlined in CFP Board's Code of Ethics and Standards of Conduct and to acknowledge CFP Board's right to enforce them through its Disciplinary Rules and Procedures. The Code of Ethics and Standards of Conduct require that CFP Professionals provide financial planning services in the best interests of their clients.

- Certification Application – Properly complete a Certification Application to (i) acknowledge voluntary adherence to the terms and conditions of certification with CFP Board and (ii) disclose any involvement in criminal and civil proceedings, inquiries or investigations, bankruptcy filings, internal reviews and customer complaints.

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.

You may verify an individual's CFP® certification and background through the CFP Board. The verification function will allow you to verify an individual's certification status, CFP Board's disciplinary history and any bankruptcy disclosures in the past ten years. Additional regulatory information may also be found through FINRA'S BrokerCheck and the SEC's Investment Adviser Public Disclosure databases, which are free tools that may be used to conduct research on the background and experience of CFP® professionals and those who held CFP® certification at one time, including with respect to employment history, regulatory actions, and investment-related licensing information, arbitrations, and complaints.

CFP Acknowledgment: Kaitlin acknowledges his responsibility as a CFP® Professional to adhere to the standards that have been established in the CFP Board's Standards of Professional Conduct. If you become aware that his conduct may violate the Standards of Professional Conduct, you may file a complaint with the CFP Board at www.CFP.net/complaint.

Item 3 – Disciplinary Information

Kaitlin E. Bell has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Registered Representative of Securities America, Inc.

Kaitlin is separately licensed as a registered representative with Securities America, Inc. ("SAI") an SEC registered broker-dealer. When acting in her separate capacity as a registered representative of SAI, she may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, she may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based SAI account in addition to a Townsend advisory account.

All commissions earned for brokerage transactions are assigned to a master business account maintained by the branch office. All individuals that are registered representatives with SAI are also investment advisor representatives of Townsend. None of these individuals, including Kaitlin, directly receive commissions earned for brokerage transactions. All individuals affiliated with the branch office are strictly compensated by salary, which salary is calculated based upon the value of that individual's client assets under management and does not account for brokerage commissions. Additionally, all clients served by any individual affiliated with the Townsend branch office receive financial planning services pursuant to a financial planning advisory services agreement with Townsend. As a result, any client who has a commission-based SAI account is also an advisory client of Townsend. Townsend has a fiduciary duty to act in the best interests of all advisory clients and the Townsend branch office has structured its compensation to individuals affiliated with the branch in a manner that is intended to eliminate any incentive to recommend commission-based products. Kaitlin will discuss the advantages and disadvantages of establishing a fee-based account through Townsend versus establishing a commission-based account through SAI with each client. Townsend does not require its advisor representatives to encourage clients to implement investment advice through SAI.

Kaitlin does not earn commissions in fee-based accounts. Kaitlin will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. Any 12b-1 fees are treated in the same manner as other brokerage compensation, and are assigned to a master business account maintained by the Townsend branch office. 12b-1 fees come from fund assets, therefore, indirectly from client assets. 12b-1 fees are received only in commission-based brokerage accounts. Kaitlin discusses with clients the selection

of a 12b-1 paying mutual fund or other trail paying mutual funds. Townsend maintains records of all 12b-1 fee payments to Kaitlin which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through Townsend or SAI. However, if a client does not choose to accept Kaitlin's advice or decides not to establish an account through SAI or an SAI-approved custodian, Kaitlin may not be able to implement transactions for the client. Clients should understand that, due to certain regulatory constraints, Kaitlin, in her capacity as a SAI registered representative must place all purchases and sales of securities products in commission-based brokerage accounts through SAI or its other approved institutions.

Item 5 – Additional Compensation

Other than the fees detailed in the Townsend Form ADV Part 2A Disclosure Brochure, Kaitlin receives no other compensation related to advisory services provided to clients.

Item 6 – Supervision

Shawn Kelly is the Chief Compliance Officer of Townsend. He is responsible for developing, overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including Kaitlin E. Bell. Shawn can be contacted at 303-452-5986.

Form ADV Part 2B Brochure Supplement – Nathaniel Francescato

Item 1 – Cover Page

Nathaniel Francescato
Townsend & Associates, Inc.
d/b/a Townsend
2761 W. 120th Ave., Suite 200
Westminster, CO 80234
Ph: 303-452-5986

Date of Supplement: February 6, 2021

This brochure supplement provides information about Nathaniel Francescato ("Nathaniel") that supplements the Townsend & Associates Inc. doing business as Townsend brochure. You should have received a copy of that brochure. Please contact Shawn Kelly at 303-452-5986 if you did not receive the Townsend brochure or if you have any questions about the contents of this supplement.

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

Item 2 – Educational Background and Business Experience

Nathaniel Francescato, Born 1990

Education Background:

Bachelor of Science in Business Administration in Finance and Accounting, University of Denver: 2011

Industry Licenses:

Series 7 (Registered Representative)
Series 24 (Registered Principal)
Series 63 (Securities Agent State Law)
Series 66 (Uniform Combined State Law Agent)

Business Background:

Townsend & Associates, Inc., *Compliance Specialist*, 01/2020 to Present
Scottrade, *Compliance Examiner*, 06/2010 to 04/2018

Item 3 – Disciplinary Information

Nathaniel Francescato has no legal or disciplinary events to report.

Item 4 – Other Business Activities

Registered Representative of Securities America, Inc.

Nathaniel is separately licensed as a registered representative with Securities America, Inc. ("SAI") an SEC registered broker-dealer. When acting in his separate capacity as a registered representative of SAI, he may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, and variable annuity and variable life products to advisory clients. As such, he may suggest that advisory clients implement investment advice by purchasing securities products through a commission-based SAI account in addition to a Townsend advisory account.

All commissions earned for brokerage transactions are assigned to a master business account maintained by the branch office. All individuals that are registered representatives with SAI are also investment advisor representatives of Townsend. None of these individuals, including Nathaniel, directly receive commissions earned for brokerage transactions. All individuals affiliated with the branch office are strictly compensated by salary, which salary is calculated based upon the value of that individual's client assets under management and does not account for brokerage commissions. Additionally, all clients served by any individual affiliated with the Townsend branch office receive financial planning services pursuant to a financial planning advisory services agreement with Townsend. As a result, any client who has a commission-based SAI account is also an advisory client of Townsend. Townsend has a fiduciary duty to act in the best interests of all advisory clients and the Townsend branch office has structured its compensation to individuals affiliated with the branch in a manner that is intended to eliminate any incentive to recommend commission-based products. Nathaniel will discuss the advantages and disadvantages of establishing a fee-based account through Townsend versus establishing a commission-based account through SAI with each client. Townsend does not require its advisor representatives to encourage clients to implement investment advice through SAI.

Nathaniel does not earn commissions in fee-based accounts. Nathaniel will receive 12b-1 fees from certain mutual fund companies as outlined in the fund's prospectus. Any 12b-1 fees are treated in the same manner as other brokerage compensation, and are assigned to a master business account maintained by the Townsend branch office. 12b-1 fees come from fund assets, therefore, indirectly from client assets. 12b-1 fees are received only in commission-based brokerage accounts. Nathaniel discusses with clients the selection of a 12b-1 paying mutual fund or other trail paying mutual funds. Townsend maintains records of all 12b-1 fee payments to Nathaniel which may be viewed by clients upon request.

Clients are never obligated or required to establish accounts through Townsend or SAI. However, if a client does not choose to accept Nathaniel's advice or decides not to establish an account through SAI or an SAI-approved custodian, Nathaniel may not be able to implement transactions for the client. Clients should understand that, due to certain regulatory constraints, Nathaniel, in his capacity as a SAI registered representative must place all purchases and sales of securities products in commission-based brokerage accounts through SAI or its other approved institutions.

Item 5 – Additional Compensation

Other than the fees detailed in the Townsend Form ADV Part 2A Disclosure Brochure, Nathaniel receives no other compensation related to advisory services provided to clients.

Item 6 – Supervision

Shawn Kelly is the Chief Compliance Officer of Townsend. He is responsible for developing, overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives, including Nathaniel Francescato. Shawn can be contacted at 303-452-5986.

TOWNSEND
Retirement & Legacy Planning

2761 West 120th Avenue, Suite 200 Westminster, CO 80234
Telephone: 303-452-5986 **Toll Free**: 800-578-9896 **Facsimile**: 303-452-5989

Please visit our Website at **www.TownsendRetirement.com**

Advisory services are offered through Townsend & Associates Inc., dba Townsend.
Financial Advisors of Townsend are Registered Representatives of and offer securities through Securities America, Inc., Member FINRA/SIPC. Townsend and Securities America, Inc. are not affiliated.

The BBB has determined this business meets BBB accreditation standards, which include a commitment to make a good faith effort to resolve any consumer complaints. BBB Accredited Businesses pay a fee for accreditation review/ monitoring and for support of BBB services to the public. BBB accreditation does not mean that the business' products or services have been evaluated or endorsed by BBB, or that BBB has made a determination as to the business' product quality or competency in performing services.

BBB ACCREDITED BUSINESS

Townsend Retirement Specialists — Quality & Excellence in Service — Since 1990