

## ADV Part 3 Form CRS: Relationship Summary

1/1/2026

### Item 1: Introduction

Financial Counseling Associates, Inc. is registered with the Security Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for the retail investor to understand the differences. Free and simple tools are available to research firms and financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

### Item 2: Relationships and Services

#### Conversation Starter:

“What investment services and advice can you provide me?”

**Description of Services:** We offer investment advisory services that include investment portfolio management, financial planning, business planning, education funding, retirement planning, life and health insurance, estate planning, and some tax planning. We monitor the investments that we implement on your behalf and if needed we suggest changes to your portfolio on a quarterly basis. We have discretionary authority over the assets that we manage which allows us to make and implement investment decisions without our clients’ written or verbal approval based on what we think is in our clients’ best interest. We provide a quarterly report to clients which includes information about investment positions and portfolio returns. The report also states our view of market conditions.

**Investments:** Generally, we communicate any portfolio changes we will make on a client’s behalf via the quarterly report we send out. Clients are given an implementation date and encouraged to contact us with questions or concerns prior to execution of the recommended action. Our discretionary authority allows us to act quickly on behalf of our clients if needed, but typically we seek to communicate changes through the quarterly report. We primarily use mutual funds and exchange traded funds to build client portfolios. We monitor these positions throughout the quarter. We can also use individual stocks, individual bonds, options, bank certificates of deposit, and private equity positions.

**Account Minimums:** Each advisor in our firm determines their own account minimums. Our account minimums may be negotiable.

#### Conversation Starter:

“Given my financial situation, should I choose an investment advisory service? Why or why not?”

“How will you choose investments to recommend to me?”

“What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?”

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

#### Conversation Starter:

“What fees will I pay?”

**Our fees:** We charge a fee of 1% annually on the first \$2 million dollars of assets under our management and a fee of 0.5% annually on all assets above \$2 million dollars of assets under our management. Our fee is billed quarterly and in advance and netted from client accounts requiring no client bill pay effort. Our service may be cancelled at any time. When a cancellation occurs mid-quarter clients may request that fees be refunded on a pro rata basis. Our fees may be negotiable. All business fee structures have conflicts of interest. A potential conflict with a fee based structure is that fee based advisers may have an incentive to encourage investors to increase assets under management with them. We seek to mitigate this risk by disclosing it and choosing to be a fiduciary adviser that always puts the best interests of our clients ahead of our own.

**Other fees and costs:** The different brokers we use charge some small trading costs (\$7 to \$48 per trade) but the majority of the investments we use have zero trading costs. Any trading costs are paid for by the client and netted from their accounts, so we try to minimize these costs for our clients. The brokers may have small but normal costs for closing accounts, wiring money, overdrawn

account fees and other. The majority of these fees can be avoided. We do not receive any benefit from any broker fees and we try to minimize all broker fees for our clients. Mutual funds and exchange traded funds have internal expenses. Part of the value we offer to clients is researching the overall performance of investments and seeking to minimize fees and maximize overall client performance.

**Additional Information:** You will pay fees and have costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. We seek to minimize fees and costs for our clients to improve long term performance. More detailed information on fees and costs can be found in our ADV Part 2A which is always available upon request.

**Conversation Starter:**

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

“What are your legal obligations to me when acting as my investment adviser?”

“How else does your firm make money and what conflicts of interest do you have?”

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

Here is an example to help you understand what this means:

One potential conflict of interest is that the more assets we manage for you the more money we potentially earn. We mitigate this conflict by disclosure, helping you compare multiple options you might consider for your assets, and putting your best interests ahead of ours even if it means we do not manage those assets.

**Conversation Starter:**

“How might your conflicts of interest affect me, and how will you address them?”

“How do your financial professionals make money?”

Our advisers are paid annual salaries. These salaries come from the fees that we charge as described above.

**Item 4: Disciplinary History**

**Conversation Starter:**

“As a financial professional, do you or your financial professionals have legal or disciplinary history? For what type of conduct?”

No, none of our advisers have any legal or disciplinary history. You can search our history at [www.investor.gov/CRS](http://www.investor.gov/CRS)

**Item 5: Additional Information**

You can find additional information by asking for our ADV Part 2A, calling us at 720-272-4419, or visiting our website at [www.fca-inc.com](http://www.fca-inc.com) where you can find a copy of this document.

**Conversation Starter:**

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