

**FORM ADV PART 2A  
DISCLOSURE BROCHURE**

**Proactive Financial  
Solutions 360, LLC**

**Office Address:**  
500 E. Washington St, #23  
North Attleboro, MA 02760

Tel: (508) 316-9360

chris@pfs360llc.com

**Website:**  
[www.pfs360llc.com](http://www.pfs360llc.com)

This brochure provides information about the qualifications and business practices of Proactive Financial Solutions 360, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at (508) 316-9360. 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 Proactive Financial Solutions 360, LLC (CRD #304440) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**MAY 24, 2021**

## **Item 2: Material Changes**

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### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

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### **Material Changes since the Last Update**

Since the last filing on March 8, 2021 the following has been amended:

- Address Change
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### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

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## Item 4: Advisory Business

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### Firm Description

Proactive Financial Solutions 360, LLC (“PFS360”) was founded in April 2019 and became a registered investment advisor in June 2019. Christopher Gauthier is 100% owner.

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### Types of Advisory Services

#### FINANCIAL PLANNING AND CONSULTING

If financial planning services are applicable, a comprehensive evaluation of an investor's current and future financial state will be provided by using currently known variables to predict future cash flows, asset values and withdrawal plans. PFS360 will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans.

Typical topics reviewed in a financial plan may include but are not limited to:

- **Financial goals:** Based on an individual's or a family's clearly defined financial goals, including funding a college education for the children, buying a larger home, starting a business, retiring on time or leaving a legacy. Financial goals should be quantified and set to milestones for tracking.
- **Personal net worth statement:** A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- **Cash flow analysis:** An income and spending plan determines how much can be set aside for debt repayment, savings and investing each month.
- **Retirement strategy:** A strategy for achieving retirement independent of other financial priorities. Including a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- **Comprehensive risk management plan:** Identify all risk exposures and provide the necessary coverage to protect the family and its assets against financial loss. The risk management plan includes a full review of life and disability insurance, personal liability coverage, property and casualty coverage, and catastrophic coverage.
- **Long-term investment plan:** Include a customized asset allocation strategy based on specific investment objectives and a risk profile.
- **Tax reduction strategy:** Identify ways to minimize taxes on personal income to the extent permissible by the tax code. The strategy should include identification of tax-favored investment vehicles that can reduce taxation of investment income.
- **Estate preservation:** Help update accounts, review beneficiaries for retirement accounts and life insurance, provide a second look at your current estate planning documents, and prompt you to update your plan when the legal environment changes or you have major life events such as a marriage, death, or births.
- **Divorce Financial Analysis:** Planning for an equitable settlement and analyze the long-term impact of divorce.

If a conflict of interest exists between the interests of PFS360 and the interests of the Client, the Client is under no obligation to act upon PFS360's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to affect the transaction through PFS360. Financial plans will be completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation.

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### **Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

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### **Wrap Fee Programs**

PFS360 does not sponsor any wrap fee programs.

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### **Client Assets under Management**

PFS360 does not manage Client assets.

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## **Item 5: Fees and Compensation**

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### **Method of Compensation and Fee Schedule**

#### FINANCIAL PLANNING AND CONSULTING

PFS360 charges either an hourly or fixed fee for financial planning. Prior to the planning process the Client will be provided an estimated plan fee. Services are completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days any unpaid earned fees will be due to PFS360. Ongoing services will remain in effect year over year unless cancelled in writing by either party by giving the other party thirty (30) days written notice.

#### HOURLY FEES

Financial Planning Services are offered based on an hourly fee of \$200 per hour. Fees are due 50% upon engagement, and the remainder upon delivery of the completed plan.

#### ONGOING FEES

Financial Planning Services are offered based on an ongoing monthly fee between \$100 and \$400. Initial onboarding fees are due 50% upon engagement, and the remainder upon delivery of the completed plan. Monthly fees are due at the end of each month.

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### **Client Payment of Fees**

Fees for financial plans will be billed to the Client and paid directly to PFS360.

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### **Additional Client Fees Charged**

There are no additional charges to disclose.

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**Prepayment of Client Fees**

Financial Planning Fees are due 50% upon engagement, and the remainder upon delivery of the completed plan.

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**External Compensation for the Sale of Securities to Clients**

PFS360 does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of PFS360.

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**Item 6: Performance-Based Fees and Side-by-Side Management**

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**Sharing of Capital Gains**

This item is not applicable since PFS360 only provides financial planning and consulting services.

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**Item 7: Types of Clients**

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**Description**

PFS360 generally provides investment advice to individuals. Client relationships vary in scope and length of service.

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**Account Minimums**

PFS360 does not require a minimum for engagement.

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**Item 8: Methods of Analysis, Investment Strategies and Risk of Loss**

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**Methods of Analysis**

In developing a financial plan for a Client, PFS360's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

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**Investment Strategy**

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

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**Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind.



## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

PFS360 and its management have not been involved in any criminal or civil action.

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### **Administrative Enforcement Proceedings**

PFS360 and its management have not been involved in administrative enforcement proceedings.

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### **Self-Regulatory Organization Enforcement Proceedings**

PFS360 and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of PFS360 or the integrity of its management.

Pursuant to Mass. Code Regs. 12.205(8)(d), Client can obtain the disciplinary history of PFS360 or its representatives upon request of the Massachusetts Securities Division.

## **Item 10: Other Financial Industry Activities and Affiliations**

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### **Broker-Dealer or Representative Registration**

No affiliated representatives of PFS360 are registered representatives of a broker-dealer.

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### **Futures or Commodity Registration**

Neither PFS360 nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

PFS360 also offers accounting and tax preparation services. Accounting and tax preparation services offered by PFS360 are separate from advisory services offered by PFS360 and are paid by separate fees. The time devoted to tax preparation increases during tax season. Clients are under no obligation to utilize PFS360 for accounting or tax preparation services.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Christopher Gauthier is also an adjunct professor with Roger Williams University. This activity is not investment related and accounts for approximately 5% of his time. This activity does not account for a substantial portion of his time during business hours or account for a substantial portion of his income. There is no conflict of interest with this activity.

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**Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

PFS360 does not select or recommend other investment advisors.

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

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**Code of Ethics Description**

The affiliated persons (affiliated persons include affiliated persons and/or independent contractors) of PFS360 have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of PFS360 affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of PFS360. The Code reflects PFS360 and its supervised persons’ responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

PFS360’s policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of PFS360 may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

PFS360’s Code is based on the guiding principle that the interests of the Client are our top priority. PFS360’s officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client’s interests over the interests of either affiliated persons or the company.

The Code applies to “access” persons. “Access” persons are affiliated persons who have access to non-public information regarding any Clients’ purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

PFS360 will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

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**Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

PFS360 and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

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**Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

PFS360 does not manage Clients' assets, does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

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**Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

PFS360 does not manage Clients' assets, does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

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**Item 12: Brokerage Practices**

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**Factors Used to Select Broker-Dealers for Client Transactions**

PFS360 does not manage money, therefore PFS360 does not recommend the use of a particular broker-dealer.

- *Directed Brokerage*  
PFS360 does not recommend broker-dealers.
- *Best Execution*  
Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. PFS360 does not manage or supervise Client accounts.
- *Soft Dollar Arrangements*  
PFS360 does not maintain any soft dollar arrangements.

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**Aggregating Securities Transactions for Client Accounts**

PFS360 is not authorized to aggregate purchases and sales and other transactions.

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**Item 13: Review of Accounts**

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**Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement, PFS360 suggests updating at least annually.

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**Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of Clients' financial plan are changes in the tax laws, new investment information, and changes in a Client's personal situation (i.e. employment, marital status, inheritance, birth of a new child, etc.)

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**Content of Client Provided Reports and Frequency**

Clients will receive written reports and written or verbal communications with recommendations or strategies for moving forward.

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**Item 14: Client Referrals and Other Compensation**

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**Economic benefits provided to the Advisory Firm from External Sources and Conflicts of Interest**

PFS360 may refer Clients to various affiliated and unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. PFS360 may receive compensation for these referrals. Likewise, PFS360 may receive non-compensated referrals of new Clients from various third parties.

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**Advisory Firm Payments for Client Referrals**

PFS360 does not compensate for Client referrals.

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**Item 15: Custody**

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**Account Statements**

PFS360 does not have any accounts under their supervision or management.

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**Item 16: Investment Discretion**

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**Discretionary Authority for Trading**

PFS360 does not manage securities accounts on behalf of Clients.

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**Item 17: Voting Client Securities**

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**Proxy Votes**

PFS360 does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, PFS360 may provide recommendations to the Client. If a conflict of interest exists, it will be disclosed.

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**Item 18: Financial Information**

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**Balance Sheet**

A balance sheet is not required to be provided because PFS360 does not serve as a custodian for Client funds or securities and PFS360 does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

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**Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

PFS360 has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

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**Bankruptcy Petitions during the Past Ten Years**

PFS360 has not had any bankruptcy petitions in the last ten years.

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**Item 19: Requirements for State Registered Advisors**

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**Principal Executive Officers and Management Persons**

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

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**Outside Business Activities**

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

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**Performance Based Fee Description**

Neither PFS360 nor its management receive performance based fees. Please see Item 6 of the ADV 2A for more information.

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**Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons**

1. Neither PFS360 nor its management have been involved in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
  - a) An investment or an investment-related business or activity;
  - b) Fraud, false statement(s) or omissions;
  - c) Theft, embezzlement or other wrongful taking of property;
  - d) Bribery, forgery, counterfeiting, or extortion;
  - e) Dishonest, unfair or unethical practices.
2. Neither PFS360 nor its management have been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - a) An investment or an investment-related business or activity;
  - b) Fraud, false statement(s) or omissions;
  - c) Theft, embezzlement or other wrongful taking of property;
  - d) Bribery, forgery, counterfeiting, or extortion;
  - e) Dishonest, unfair or unethical practices.

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**Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities**

There are no material relationships with issuers of securities to disclose.

ITEM 1 COVER PAGE

**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B

Christopher Gauthier

**Proactive Financial  
Solutions 360, LLC**

**Office Address:**

500 E. Washington St, #23  
North Attleboro, MA 02760

Tel: (508) 316-9360

chris@pfs360llc.com

**Website:**

[www.pfs360llc.com](http://www.pfs360llc.com)

This brochure supplement provides information about Christopher Gauthier and supplements the Proactive Financial Solutions 360, LLC brochure. You should have received a copy of that brochure. Please contact Christopher Gauthier if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Christopher Gauthier (CRD #4861803) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**MAY 24, 2021**

## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

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#### Principal Executive Officer – Christopher Gauthier

- Year of birth: 1980
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#### Item 2 - Educational Background and Business Experience

##### Educational Background:

- Masters of Science, Accounting, University of Massachusetts – Boston, 2010
- MBA, Bryant University, 2008
- BA, Liberal Studies, Providence College, 2005

##### Business Experience:

- Director of Tax and Financial Planning and Chief Compliance Officer, Proactive Financial Solutions 360, LLC, 04/2019 to Present
- Adjunct Professor, Roger Williams University, 08/2019 to Present
- Accountant, Castro, Thresher and Oliviera P.C., 09/2019 to 05/2021
- Financial Planner, Corrigan Financial Inc., 06/2014 to 06/2019
- CPA, Charland, Marciano & Company, CPAs, LLP, 11/2011 to 06/2014
- Sales, Fresh Catch Seafood, 09/2009 to 11/2011

##### Professional Designations:

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

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

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and Client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients. CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Certified Public Accountant (CPA): A Certified Public Accountant is licensed by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include:

- Bachelor’s degree from an accredited college or university with a concentration in accounting.
- Minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA.
- Successful completion of the CPA Certification Exam.
- Follow a rigorous Code of Professional Conduct which requires they act with integrity, objectivity, due care, competence, and fully disclose conflicts of interest.
- In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period, or 120 hours over a three year period).

Personal Financial Specialist (PFS): Personal Financial Specialist (PFS) is a specialty credential awarded by the American Institute of Certified Public Accountants (AICPA). The requirements are:



- Obtain and hold an unrevoked CPA License.
- Join the AICPA and be a member in good standing.
- Complete comprehensive PFP Education; a minimum of 80 hours of personal financial planning education within the five-year period preceding the date of the PFS application.
- Attain a specified level of PFP Experience; must have two years of full-time business or teaching experience (or 3,000 hours equivalent) in personal financial planning within the five-year period preceding the date of the PFS application.
- Pass a PFP Examination.
- Adhere to AICPA's Code of Professional Conduct.
- Upon approval, the candidate will become a member of an exclusive community of CPA financial planners: The PFS credential holder. Initial certification is good for a three-year period.
- To maintain the PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years.

Certified Divorce Financial Analysts® (CDFA): A designation awarded to people with experience in the unique financial circumstances that surround a divorce. The professional training for the certification is focused on understanding and estimating the long-term costs of a divorce.

- Experience - CDFAs practitioners must have a minimum of three years work experience in a financial or legal capacity prior to earning the right to use the CDFAs certification mark.
- Education - CDFAs candidates must also develop their theoretical and practical understanding and knowledge of the financial aspects of divorce by completing a comprehensive course of study approved by the Institute for Divorce Financial Analysts™ (IDFA™).
- Examination - CDFAs candidates must complete a four-part Educational Curriculum and Certification Exam that tests their understanding and knowledge of the financial aspects of divorce. The candidate must also demonstrate the practical application of this knowledge in the divorce process by completing a comprehensive case study.
- Ethics - CDFAs practitioners agree to abide by a strict code of professional conduct known as the IDFA Code of Ethics and Professional Responsibility, which sets forth their ethical responsibilities to the public, Clients, employers and other professionals. The IDFA may perform a background check during this process and each CDFAs candidate must disclose any investigations or legal proceedings relating to his or her professional or business conduct.
- Ongoing Certification Requirements - CDFAs practitioners are required to maintain technical competence and to fulfill ethical obligations. Practitioners must pay an annual reinstatement fee. Every two years, they must complete a minimum of fifteen (15) hours of continuing education specifically related to the field of divorce.

In addition to the biennial continuing education requirement, all CDFA practitioners must voluntarily disclose any public, civil, criminal, or disciplinary actions that may have been taken against them during the past two years as part of the renewal process.

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**Item 3 - Disciplinary Information**

- A. Christopher Gauthier has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
  - 1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
  - 2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
  - 3. Was found to have been involved in a violation of an investment-related statute or regulation; or
  - 4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Christopher Gauthier never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
  - 1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
  - 2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Christopher Gauthier has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
  - 1. Was found to have caused an investment-related business to lose its authorization to do business; or
  - 2. Was found to have been involved in a violation of the SRO’s rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.

- D. Christopher Gauthier has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

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**Item 4 - Other Business Activities**

PFS360 also offers accounting and tax preparation services. Accounting and tax preparation services offered by PFS360 are separate from advisory services offered by PFS360 and are paid by separate fees. The time devoted to tax preparation increases during tax season. Clients are under no obligation to utilize PFS360 for accounting or tax preparation services.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Christopher Gauthier is also an adjunct professor with Roger Williams University. This activity is not investment related and accounts for approximately 5% of his time. This activity does not account for a substantial portion of his time during business hours or account for a substantial portion of his income. There is no conflict of interest with this activity.

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**Item 5 - Additional Compensation**

Christopher Gauthier receives compensation from the items listed in Item 4 above, but does not receive any performance based fees.

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**Item 6 - Supervision**

Since Christopher Gauthier is the sole owner and investment adviser representative of PFS360 he is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at [chris@pfs360llc.com](mailto:chris@pfs360llc.com) or (508) 316-9360.

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**Item 7 - Requirements for State-Registered Advisors**

- A. Christopher Gauthier has not been involved in any of the following:
1. An arbitration claim alleging damages in excess of \$2,500 involving any of the following:
    - a) An investment or an investment-related business or activity;
    - b) Fraud, false statement(s) or omissions;
    - c) Theft, embezzlement or other wrongful taking of property;
    - d) Bribery, forgery, counterfeiting, or extortion;
    - e) Dishonest, unfair or unethical practices.

2. Been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - a) An investment or an investment-related business or activity;
  - b) Fraud, false statement(s) or omissions;
  - c) Theft, embezzlement or other wrongful taking of property;
  - d) Bribery, forgery, counterfeiting, or extortion;
  - e) Dishonest, unfair or unethical practices.
- B. Christopher Gauthier has not been the subject of a bankruptcy petition in last 10 years.