

TUCKER FINANCIAL SERVICES, INC.

425 Phoenix Drive

Chambersburg, PA 17201

(717) 267-1426

(717) 267-1584 Fax

tuckerfs@tuckerfinancialservices.com

www.tuckerfinancialservices.com

Registered Investment Advisory Services

Firm Brochure Part 2A of Form ADV Updated January 1, 2018

This brochure provides information about the qualifications and business practices of Tucker Financial Services, Inc. If you have any questions about the contents of this brochure, please contact us by telephone at (717) 267-1426, by facsimile at (717) 267-1584, or through our web site at www.tuckerfinancialservices.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.

Tucker Financial Services, Inc. is a registered investment adviser. Registration is mandatory for all persons meeting the definition of investment advisor and does not imply a certain level of skill or training. Additional information about Tucker Financial Services, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

On July 28, 2010, the United State Securities and Exchange Commission (SEC) published Rule changes to Form ADV. These changes required Tucker Financial Services, Inc. to amend their disclosure document that they provide to clients in order to conform to the regulations as required by the new Rule. This Brochure is a new document prepared in accordance with the SEC's new Rule requirements, and is materially different in structure and requires new information that our previous disclosure document did not require.

The date that our last annual update was made to our brochure was May 10, 2017.

The following material changes have been made to our brochure since our annual amendment was filed on May 10, 2017:

- Tucker Financial Services, Inc. is currently leasing an office space at 75 S. Houcks Road, Suite 201, Harrisburg, PA 17109 as a remote location to meet with clients in Harrisburg, Camp Hill & surrounding areas, this office space replaced the office space located at 2 Lemoyne Drive, Lemoyne, PA 17043.
- Tucker Financial Services, Inc has become registered with the United States Securities and Exchange Commission as of the date of this filing in March 2018.

In the past we have delivered or offered to deliver our disclosure document, which contained information about our qualifications and business practices, to clients on at least an annual basis. Pursuant to the new SEC Rules, we will ensure that you receive either a copy of our current brochure that includes a summary of any materials changes to our brochure or a summary of material changes that includes an offer to provide a copy of our current brochure within 120 days of the close of our business' fiscal year. We will also provide you with a new brochure as necessary based on changes or new information, or at your request at any time, without charge. You may request our brochure by contacting our office at (717) 267-1426 or tuckerfs@tuckerfinancialservices.com. Our Brochure is also available on our website at www.tuckerfinancialservices.com.

Additional information about Tucker Financial Services, Inc. is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Tucker Financial Services, Inc. who are registered, or are required to be registered, as investment adviser representatives of Tucker Financial Services, Inc.

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ITEM 4 - ADVISORY BUSINESS

The Firm – Tucker Financial Services, Inc.

In April 1983, Thomas C. Tucker established Tucker Financial Services, Inc. (herein after referred to as “Tucker Financial”, “TFSI” or the “Firm”). Tucker Financial is a full service independent investment advisory firm registered with the SEC in March of 2018 and notice filed with Pennsylvania Department Banking & Securities and State of Maryland Office of the Attorney General. As of January 1, 2017, Mr. Christopher J. Jackson is the Principal owner and Chief Executive Officer of Tucker Financial Services, Inc. Mr. Jackson is responsible for the supervision of all employees of the Firm and overall management and direction of the advisory services provided to clients. In June 2004, Joanna L. St.Clair became Tucker Financials Chief Compliance Officer, and in January 2007, Colleen Browell became Tucker Financials Chief Operations Officer. Christopher J. Jackson is an Investment Adviser Representative of Tucker Financial (hereinafter they are referred to as the “Investment Advisor Representative”). In January of 2017, Thomas C. Tucker, Investment Advisor Representative, became an Independent Consultant of Tucker Financial Services, Inc. In February of 2017, Kira Lee Cramer became a Registered Investment Advisor Representative with Tucker Financial Services, Inc.

Tucker Financial provides its Clients financial planning and consulting services as well as discretionary investment advisory services. Tucker Financials Investment Advisor Representative(s) offers to provide investment advisory services to clients where custody of the accounts are maintained at Charles Schwab & Co., Inc. (Schwab), Member FINRA/ SIPC, Fidelity Brokerage Services, LLC (Fidelity), a Member of FINRA/SIPC, American Funds Advisory Services (American Funds), SEI, Vanguard, or other similar qualified custodians (hereinafter collectively referred to as the “custodian”). At a minimum, each client will receive confirmation of all trades, monthly statements of activity and balances, and quarterly consolidated appraisals with asset performance calculations from the custodian.

Services Provided

Financial Planning and Consulting

Tucker Financials Advisors offers clients Financial Planning and Consulting Services relating to but not limited to:

- Education and College Expense Planning;
- Estate Planning;
- Investment Planning;
- Net worth, Cash Flow, and Financial position;
- Portfolio Evaluation, Design and Management;
- Risk Management (insurance);
- Death, Disability and Retirement Planning
- Tax Planning
- Charitable Gift Planning;
- Tax Efficient Wealth Distribution/Legacy Planning;
- Other investment and non-investment related matters.

Clients are required to enter into Tucker Financials Financial Planning and Consulting Agreement prior to engaging Tucker Financial to provide financial planning or consulting services. This agreement sets forth the terms and conditions of the engagement, describes the scope of services to be provided, and the fee(s) that the client will be charged. If the Client has not received a copy of the Advisor's Disclosure Document at least 48 hours prior to the execution of this Agreement, the Client shall have 5 business days from the date of execution of this Agreement to terminate the Advisor's services without penalty.

The Investment Advisor Representative collects the Client's personal and financial data, including their desired financial goals and objectives. The Investment Advisor Representatives then analyzes the data and makes recommendations, both orally and/or in writing for the planning or consulting service(s) that the client desired. All recommendations are client specific based on the client's financial goals, risk profile and return objectives, at the Client's request, Tucker Financials Investment Advisor Representative(s) may recommend the services of other professionals (attorneys, CPAs, etc.) for implementation purposes or the use of financial products (insurance and/or securities).

Clients are not obligated to engage the services of any recommended professional. Clients retain absolute authority over all implementation decisions and are free to accept or reject any recommendation from Tucker Financial or its Investment Advisor Representative(s). Clients are free to select any brokerage firm, insurance company, or similar sales agency he/she desires for the implementation of any recommendations made during the analysis of their personal and financial information. Should the Client decide to implement the Investment Advisor Representative's recommendations with Tucker Financial, investments will be transacted through Tucker Financials qualified custodian. This may cause a potential conflict of interest since advisory fees are paid to Tucker Financial or its Investment Advisor Representative(s) thru these custodians. Tucker Financial or its Investment Advisor Representative(s) generally charges either an hourly or fixed fee for financial planning and consulting services.

Investment Advisory Services

Prior to engaging Tucker Financial to provide investment advisory services, Clients are required to enter into a formal Investment Advisory Agreement with Tucker Financial setting forth the terms and conditions under which the Advisor will manage the Client's investments, and the fees or other charges the Client will pay. Separate custodial documents may also be required prior to establishing an account.

Upon signing Tucker Financials Investment Advisory Agreement, Clients grant Tucker Financials Investment Advisor Representative(s) limited discretionary authority to manage their portfolios on a discretionary basis, and to respond to inquiries from and communicate and share information with the Client's attorney, accountant and other professionals to the extent necessary in the furtherance of Tucker Financials services. Clients also authorize Tucker Financial and/or their account custodian(s) to debit their account(s) for payment of investment advisory fees. If the Client has not received a copy of the Advisor's Disclosure Document at least 48 hours prior to the execution of this Agreement, the Client shall have 5 business days from the date of execution of this Agreement to terminate the Advisor's services without penalty.

Tucker Financial provides investment advisory services for Client(s) and determines a suitable portfolio based upon the information provided by the Client as to the Client's investment objectives, risk tolerance and financial circumstances. Tucker Financials Investment Advisor Representative(s) primarily recommend that Clients allocate their investment assets among various equity and fixed income mutual funds and exchange traded funds (ETF's). Individual equities, bonds and other fixed income securities may also be recommended to Clients on a limited basis. The Investment Advisor Representative then designs an asset allocated portfolio in accordance with the Client's investment objectives, risk tolerance, and investment restrictions (if any) imposed by the client.

Clients have the ability to impose restrictions on certain securities or types of securities that they want their investment assets to be allocated. These restrictions are documented on Tucker Financials Investment Disclosure Document, a copy of which is included in this brochure.

Tucker Financial has established the following procedures in the event that a trading error occurs during the execution of a security transaction:

- a) Upon discovery of the trade error, the Investment Advisor Representative will immediately notify the custodian's trading department with details concerning the error. The custodian will flatten the incorrect transaction with a covering transaction, regardless of whose fault it is. This immediate action will limit the potential effects that capital market fluctuations may have upon further price deterioration or appreciation. Specifically, any thought of delaying immediate remedial action in the hopes of an advantageous market swing is avoided through this action.
- b) The Investment Advisor Representative will give the trader the correct transaction that should have been executed.
- c) The custodian will confirm the correct price that the client should have received had the order been processed correctly.
- d) The Investment Advisor Representative must file a trade error report with Tucker Financials Chief Compliance Officer (CCO).
- e) A trade error report containing the following information must be completed:
 - Account registration and number;
 - The trade and settlement dates;
 - The number of shares or dollar value of the trade;
 - An explanation of the error;
 - The resolution of the error; and
 - If the client lost money due to the error, include any information to evidence that the client was made whole and not harmed in any way.
- f) The CCO or a designated alternate will review the trade error report to ensure that the client is not injured in any way.
- g) Any restitution to the client's account must be settled through a master account for Tucker Financial Services Inc. at the appropriate custodian.
- h) Tucker Financial will maintain copies of all trade error reports.

Clients are continually advised that it remains their responsibility to promptly notify Tucker Financial if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising Tucker Financials previous recommendations or

services, or if they wish to impose any reasonable restrictions on Tucker Financials investment advisory services.

Occasionally, Tucker Financial Services, Inc. will provide articles or newsletters to clients through a mailing. These publications have been previously approved by CEO, CCO prior to the mailing. All copies with approvals are kept in the Advertising file.

On occasion, Tucker Financial Services, may provide educational seminars or workshops to existing clients and or prospects. They will be generic in content and will not contain any reference to any particular fund or fund company. All copies of the materials will be kept with approvals in the Advertising file along with the list of attendees and invitees.

Remote Location:

Tucker Financial Services, Inc. has leased an office space at 75 S. Houcks Rd, Suite 201, Harrisburg PA 17109. This office space will be used for meeting clients & prospective clients in the Harrisburg & Camp Hill and surrounding areas. There will be no books or records kept at this location and no onsite personnel. An Advisor / Consultant will travel to the said location for scheduled appointments (office only open by appointment only) to meet with scheduled clients/prospect clients to discuss their accounts or possibility of becoming a Tucker Financial Services, Inc. client.

Interns:

Tucker Financial Services, Inc. will from time to time employ Interns from the local University. Interns will be interviewed by the CEO and other employees. They will submit a resume and the CCO will submit their names on the FINRA OFAC tool. They will complete all appropriate employment paperwork, sign confidentiality agreements, read policies & procedures, and receive the employee handbook. Their responsibilities will include, mailing out correspondence to clients, newsletters, mass mailings, marketing & advertising, & any other duties as assigned.

ITEM 5 - FEES AND COMPENSATION

Financial Planning and Consulting Service Fees:

Tucker Financials financial planning and consulting fees range from \$100 to \$5,000 on a fixed fee basis, or \$150 on an hourly rate basis, depending upon the complexity of the plan and level of the services required by the Planner or other professionals rendering the service.

If clients engage Tucker Financial for financial planning or consulting services, fifty percent (50%) of any fixed fee (\$1000 maximum) may be payable upon signing Tucker Financials Financial Planning and Consulting Service Agreement, with the balance payable upon presentation and delivery of the plan. Prepayment of fees will not exceed \$500, unless the services are rendered within six (6) months of execution of the Financial Planning and Consulting Services Agreement.

If clients engage Tucker Financial for consulting services, an initial payment may be required upon signing Tucker Financials Financial Planning and Consulting Services Agreement. Clients will receive a Financial Planning Estimate prior to signing the Financial Planning Agreement. Clients are billed in fifteen (15) minute increments (\$37.50 maximum per 15 minutes) and will receive a billing invoice at the end of the consultation.

All financial planning and consulting service fees paid to Tucker Financial are separate and distinct from other fees that the Client pays, including investment advisory fees, transaction fees, short term trading fees, underlying mutual fund fees and expenses paid to the fund by shareholders of the fund as outlined in each fund's prospectus, and custodial fees. In addition, Clients will pay brokerage and transaction fees, commissions, transfer taxes, exchange fees, and any other charges with regard to the Client's brokerage account.

Kira Cramer assists Christopher Jackson in facilitating Financial Planning Services. Kira's duties may include research, gathering data, helping with projects, utilizing software for financial plans, and any other duties the Advisor may require for completion and delivery of the plan. Tucker Financial Services will share ½ of all Financial Planning Fees that Kira Cramer provides or assists Christopher Jackson with creating for clients. Kira Cramer has signed the appropriate Confidentiality Agreement. Kira Cramer is also a Registered Investment Advisor of Tucker Financial Services, Inc.

Tucker Financial or its Investment Advisor Representative(s) reserve the right to negotiate financial planning and consulting fees on a case by case basis.

Termination of Financial Planning and Consulting Services

A Client may terminate financial planning and consulting services at any time upon written notice. The Client will be charged at the applicable hourly rate for the time that Tucker Financial or its Investment Advisor Representative(s) have expended prior to the Client terminating, and any prepaid unearned fees will be returned to the Client.

Investment Management Fees

Tucker Financial charges an annual investment management fee based on a percentage of the market value of the assets being managed by Tucker Financial. The annual fee is prorated and charged quarterly, in advance, based upon the market value of the assets on the last day of the previous quarter, provided however, that (a) with respect to the initial fee, the Advisory Fee shall be based upon the value of the account as of the day the Account's assets are placed under the Investment Advisor Representative's supervision, pro-rated for the balance of the calendar quarter, and (b) if the broker/dealer or custodian only issues statements on the Account as of the last business Friday of each month (or the next preceding business day if such Friday is a holiday), the date of the statement so issued as of the last month in any calendar quarter shall be deemed to be the last business day of such quarter for billing purposes.

Clients may pay a onetime initial set up fee that ranges from \$250 to \$500 dollars depending on the complexity of the account(s) that need to be transferred or established. This fee is based on the actual cost of time to do the custodian paperwork and the complexity of the transfer and paperwork involved. This fee is charged separate and is not covered by the assets under management fee.

Thereafter, Clients will pay Tucker Financial or its Investment Advisor Representative(s) an advisory fee based on the following annual rates:

<u>Account Value</u>	<u>Maximum Annual Fee</u>
\$0 to \$999,999	1.00%
\$1,000,000 to \$2,000,000	0.80%
\$2,000,000 to \$4,000,000	0.60%
\$4,000,000 to \$7,000,000	0.50%
\$7,000,000 to \$20,000,000	0.45%
\$20,000,000 & Above	0.35%

*Note: This is not a tiered schedule, once breakpoint/threshold is reached, fee is that stated.

Upon signing Tucker Financials Investment Advisory Agreement, Clients may choose to be billed directly by the Investment Advisor Representative for management fees with payment due within 30 days of receipt of the billing invoice, or have management fees directly deducted from their accounts by the custodian of their account(s). Clients designate their option on their signed Investment Advisory Agreement.

If the Client chooses to have the management fee directly debited from their account, the Investment Advisor Representative will send a quarterly invoice to the Client and upload the Advisory fees due for each quarter and the manner in which such fee was to be calculated. The Client authorizes the custodian to deduct the Advisory Fee from the account and remit the same to the Investment Advisor Representative pursuant to its invoice, and the custodian shall not be required to verify the Investment Advisor Representative's calculation of the Advisory Fee. To satisfy the payment of the Advisory Fee, funds will be deducted directly from the Account, and if necessary, from liquidating holdings in the following order: (a) money market funds, or (b) current positions in the Account. It should be noted that some mutual funds and securities that are purchased and sold for the Account will have transaction fees, commissions, and/or redemption fees that will be charged to the Client. These transaction fees, etc. are not shared with Tucker Financial or its Investment Advisor Representatives and are paid directly to the custodian.

All asset management (investment advisory) fees paid to Tucker Financial are separate and distinct from other fees the Client pays, including financial planning and consulting fees, transaction fees, short term trading fees, underlying mutual fund fees and expenses paid to the fund by shareholders of the fund as outlined in each fund's prospectus, and custodial fees. In addition, Clients may pay brokerage and transaction fees, commissions, transfer taxes, exchange fees, and any other charges that may be imposed with regard to the client's brokerage account.

Tucker Financial or its Investment Advisor Representative(s) reserves the right to negotiate and discount any investment advisory fees on a case by case basis.

Tucker Financial Services, Inc. and its Advisor(s) manage 100% of the Client accounts on a discretionary basis, which as of **December 31, 2017**, were 468 accounts totaling **\$114,869,637 in assets under management**.

Termination of Investment Management Services

A Client may terminate Tucker Financials Investment Advisory Services at any time by giving written notice to Tucker Financial or its Investment Advisor Representatives at least (7) days prior to the date of termination (the "Termination Date"). Effective on the Termination Date, the Investment Advisor Representative(s) shall refrain, without liability, from taking any further action with respect to the Account. Tucker Financial will cease to be entitled to receive fees for any period following the Termination Date.

Clients terminating their advisory relationship with Tucker Financial prior to the end of the quarter are entitled to a pro-rata refund of any unearned investment management fee at time of termination. The refund amounts are determined by taking the current quarterly fee and divide it by 90 (the number of days per quarter). The result is then multiplied by the remaining number of days left in that billing quarter to arrive at the amount that the client will be refunded. This process is automatically calculated through Morningstar Office the portfolio management software in which all of Tucker Financials billing is calculated.

The Client will have immediate access to the assets in his or her account(s), subject to any restrictions imposed by the custodian of the accounts.

Termination of Tucker Financials Investment Advisory Agreement shall not affect either (a) the validity of any action taken by the Investment Advisor Representative pursuant to the Agreement, or (b) the liabilities and obligations of the parties with respect to any transactions effected prior to the Termination Date.

The death, disability or incompetency of the Client will not terminate or change the terms of Tucker Financials Investment Advisory Agreement. However, the Client's executor, guardian, attorney-in-fact or other authorized representative may terminate the Agreement by giving written notice to Tucker Financial or its Investment Advisor Representative(s). The Client and/or its authorized representative recognize that the Custodian may not permit any further Account transactions until such time as any required documentation is provided to the Custodian.

ITEM 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Neither Tucker Financial nor its investment advisor representatives charge Clients fees based upon a share of capital gains or capital appreciation of the assets in the Client's account. Tucker Financial Services, Inc. maintains a complete Compliance Manual with updated written supervisory procedures. The written supervisory procedures manual are updated at least annually by Joanna St.Clair, CCO. The written supervisory procedures contain internal procedures and reviews which are conducted by Joanna St.Clair, CCO and the findings reviewed by Christopher Jackson, CEO.

ITEM 7 - TYPES OF CLIENTS

Tucker Financial Services, Inc. generally provides investment advisory services including financial planning and consulting services to individuals, institutions, high net-worth individuals, pension and profit-sharing plans, trusts, estates, foundations/endowments, or charitable organizations, and corporations or business entities other than those previously listed.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS

Tucker Financials Advisor(s) employs the following methods, but are not limited to, of analysis prior to purchasing or selling a security for a Client's account:

- **Fundamental Analysis** - is a method of evaluating a security that entails attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. In doing so, the Advisor attempts to study everything that can affect the securities value (like the overall economy and industry conditions) and company-specific factors (like financial condition and management). Based on the advisor's analysis he can produce a value for the security and compare it with the securities current price to determine what position to take (if any) regarding that security.
- **Charting Analysis** – is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technically 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.
- **Dollar Cost Averaging** – The technique of buying a fixed dollar amount of a particular investment on a regular schedule, regardless of the share price. More shares are purchased when prices are low, and fewer shares are bought when prices are high.
- **Technical Analysis** – is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. When analyzing securities using technical analysis the Advisor does not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity.
- **Cyclical Analysis** – is a method of analyzing securities that rise quickly when economic growth is strong and falls rapidly when growth is slowing down.

Asset Allocation

When Tucker Financials Investment Advisor Representative(s) constructs a new portfolio for a Client, they begin with a risk tolerance questionnaire / Investment Policy Statement. The Investment Advisor Representative(s) uses this assessment as well as conversations to establish an asset allocation for the Clients. Once the Investment Advisor Representative has established the percentages for each asset category, they begin to search for specific investments which generally include, but are not limited to, various equity and fixed income mutual funds and ETFs.

To aid in their search, the Investment Advisor Representatives utilize software, custodian websites, financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the SEC, and Company press releases. The Investment Advisor Representative(s) use the screening tools and research reports from the internet to determine which securities might be appropriate buys. The Investment Advisor Representative sells securities as the Client's investment objectives change; when the securities

have higher than average gains; or if the future outlook for any given security turns unfavorable (i.e. lowered earnings guidance or estimates, etc.).

Tucker Financials overall investment strategy, based on the demographics of its client base, is to manage accounts in order to protect and grow the Client's assets. To accomplish this Tucker Financial and its Investment Advisor Representative employs a conservative, diversified asset allocation investment strategy to manage Client portfolios. This strategy allows the Investment Advisor Representative to set a minimum and maximum percentage range for each asset class (i.e. equities 40 -50 %). With the ability to operate within the minimum and maximum range, the Investment Advisor Representative is able to engage in short-term, tactical deviations from the asset mix in order to capitalize on unusual or exceptional investment opportunities. Thus, a minor form of market timing is possible, since the Investment Advisor Representative can move to the higher end of the percentage range when securities are expected to do better and to the lower end of the percentage range when the economic outlook is bleak. The overall strategic asset mix is returned to when desired short-term profits are achieved.

Risk Associated with Asset Allocation

There is risk associated with any investment strategy, including asset allocation. Since this investment strategy allows the adviser to engage in short-term trading in order to capitalize on unusual or exceptional investment opportunities, the Client must be aware of the following risk associated with short-term trading:

- Increased brokerage and other transaction cost – Clients may see an increase in brokerage fee and expenses depending on the volume of trading activity by the Investment Advisor Representative in the account.
- Tax consequences resulting from short-term capital gains – Clients may be exposed to a tax consequence due to the amount of short-term capital gains within the account.
- Account restrictions and penalties imposed by Mutual Fund Companies – Fund companies may place restrictions on an Advisor or an account for violating the Fund's short-term trading policy.

Risk of Loss

Investors must be aware that there is a potential risk of loss to any investor whether or not they decide to invest their money. If investors decide to invest their money, they are obligated to assume a portion of risk. The amount of risk that they assume varies from investor to investor, and is one of the contributing factors for an Investment Advisor Representative in determining a suitable portfolio for its client. The following is a list of some of the risk that an investor may be exposed to:

- Market Risk – These are risk that affect the entire market and cannot be avoided through diversification. This risk may be caused by events such as overall market changes, local, regional, or global political, social, or economic instability, governmental or governmental agency responses to economic conditions, interest rates, a recession, or wars.
- Interest Rate Risk - The risk that an investment's value will change due to a change in the level of interest rates Interest rate risk affects the value of bonds more directly than stocks, and it is a major risk to all bondholders. As interest rates rise, bond prices fall and vice

versa. Falling interest rates may cause an issuer to redeem, “call” or refinance a security before its stated maturity date, which may result in having to reinvest the proceeds in lower yielding securities.

- Unsystematic Risk – These are risk that are specific to a company or industry sector and may be avoided or mitigated by diversification. There is a risk that the company will perform poorly or have its value reduced based on factors specific to the company or industry
- Credit Risk – The risk that a company or municipality will not be able to repay its lenders. This is very important to those investing in fix-income investments such as bonds.
- Country Risk – Is a group of risk that is associated with investing in a foreign country. This risk includes political risk, exchange rate risk, economic risk, sovereign risk and transfer risk, which is the risk of capital being locked up or frozen by government action.

Investing in securities involves risk of loss that clients should be prepared to bear. Your investments are not bank deposits and are not insured or guaranteed by the FDIC or any other governmental agency, entity, or person, unless otherwise noted and explicitly disclosed as such, as such may lose value.

If investors decide not to invest their money, then they face the risk of the loss of any potential gains that they would have had if they were invested.

ITEM 9 - DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Tucker Financial Services, Inc. or the integrity of Tucker Financial Services, Inc. management. Neither Tucker Financial nor its Investment Advisor Representative(s) have ever been involved in any legal or disciplinary actions or administrative proceedings brought before the SEC, or any other federal or state regulatory agency. Neither Tucker Financial Services or its Investment Advisor Representatives have ever been the subject of any criminal or civil action in a domestic, foreign, or military court.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Tucker Financials Advisor(s) offers to provide investment advisory services to clients where custody of the accounts are maintained at Charles Schwab & Co., Inc. (Schwab), Member FINRA/SIPC, Fidelity Brokerage Services, LLC (Fidelity), a Member of FINRA/SIPC, American Funds Advisory Services (American Funds), SEI, Vanguard, or other similar qualified custodians.

Tucker Financial does not have any related persons that are one of the following:

- Broker-dealer, municipal securities dealer, or government securities dealer or broker
- Investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund)
- Other investment adviser or financial planner
- Futures commission merchant, commodity pool operator, or commodity trading advisor
- Banking or thrift institution

- Accountant or accounting firm
- Lawyer or law firm
- Insurance company or agency
- Pension consultant
- Real estate broker or dealer
- Sponsor or syndicator of limited partnerships.

Tucker Financial Services, Inc. does have one Investment Adviser Representative that is licensed and able to sell insurance products if a client requires or requests. The Client is under no obligation to purchase products recommended, or to purchase products either through Tucker Financial Services, IAR's or through the insurance companies that the IAR is appointed with. Thus, a conflict of interest exist if there is a commission paid on the insurance product and if the client is a potential asset management client or existing asset management client.

ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics Disclosure

Tucker Financial has adopted a Code of Ethics and Personal Securities Trading Policy to comply with SEC Rule 204A-1. The Code set forth a standard of business conduct for the Firm and all persons associated with the Firm. The purpose of this Code is to set out ideals for integrity, objectivity, competence, fairness, confidentiality, professionalism and diligence for the Firm and its associated persons to espouse in the interest of the Firm and investor protection. In particular, the Code is designed to:

- Protect the Clients by deterring misconduct.
- Protect Tucker Financials reputation.
- Establish procedures to ensure that Advisors put the Client's interest first and avoid any conflicts of interest
- Require that employees comply with all Federal and State Securities laws and Regulations
- Establish procedures to ensure that Advisors conduct themselves ethically at all times.

In an effort to meet the above obligations, the Code sets out policies and procedures that Tucker Financials Advisors are expected to follow in the following areas:

- Compliance
- Privacy and Confidentiality
- Personal securities transactions and reporting
- Insider trading
- Conflicts of interest / outside business activities
- Gifts and Entertainment
- Reporting violations and sanctions
- Record keeping

Clients and prospective Clients may obtain a complete copy of Tucker Financials Code of Ethics upon request by contacting their Advisor in writing at 425 Phoenix Drive, Chambersburg, PA 17201 or calling our Office at (717) 267-1426.

In accordance with Section 204A of the Investment Advisers Act of 1940, Tucker Financial also maintains and enforces written policies and procedures reasonably designed to prevent the misuse of material non-public information by Tucker Financial or any access persons of Tucker Financial with regards to their personal securities transactions.

Privacy Statement

Tucker Financial also protects the personal non-public information of its Clients and employees, and its Advisors are expected to exercise diligence and care in maintaining and protecting the Client's non-public confidential information. Tucker Financial holds all personal information provided to the Firm in the strictest confidence. The records that Tucker Financial maintains include all personal information that the Investment Advisor Representatives collect from Clients in connection with any of the services provided by Tucker Financial. Tucker Financial has never disclosed information to non-affiliated third parties, except as permitted by law, and does not anticipate doing so in the future. If Tucker Financial were to anticipate such a change in its Firm's policy, it would be prohibited under the law from doing so without speaking with the Client first. The Investment Advisor Representatives use health and financial information that the Client provides in order to help the Client meet their personal financial goals. Tucker Financial has established the following procedures to mitigate any real or perceived infringements of the Client's rights of privacy:

- Tucker Financial limits employee and agent access of information to only: 1) those who have a business or professional reason for knowing (i.e. broker/dealer or custodian); 2) non-affiliated parties as permitted by law (i.e. federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or attorney.); or 3) those required by judicial or regulatory process.
- Tucker Financial maintains a secure office and computer environment to ensure that Client's information is not placed at unreasonable risk.
- The categories of non-public personal information that the Investment Advisor Representatives collect from Clients depend upon the scope of the Client's engagement. It will include information about their personal finances, information about their health to the extent that it is needed for the planning process, information about transactions between the Client and third parties, and information from consumer reporting agencies.
- For unaffiliated third parties that require access to the Client's personal information, including financial services companies, service providers, and auditors, Tucker Financial also requires strict confidentiality in their agreements with them and expects them to keep this information private. Federal and state regulators may also review the Firm's records as permitted by law.
- The disclosure information contained in any document completed by the Client for processing and/or transmittal by Tucker Financial in order to facilitate the commencement, continuation or termination of a business relationship between the Client and a non-affiliated third party service provider (i.e., broker/dealer, investment advisor, account

custodian, insurance company, etc.), including information contained in any document completed and/or executed by the Client for Tucker Financial (i.e., advisory agreement, Client information form, etc.), shall be deemed as having been automatically authorized by the Client with respect to the corresponding non-affiliated third party service provider.

- Tucker Financial does not provide personally identifiable information to mailing list vendors or solicitors for any purpose.
- Personally identifiable information about a Client will be maintained during the time that they are a Client and for the required time thereafter that such records are required to be maintained by federal and state securities laws and regulations, and consistent with the CFP Board Code of Ethics and Professional Responsibility. After this required period of record retention, all such information will be destroyed.
- The Financial Industry Regulatory Authority (FINRA) was created through the consolidation of the National Association of Securities Dealers (NASD) and the member regulation, enforcement and arbitration operations of the New York Stock Exchange. The consolidation, approved by the Securities and Exchange Commission, became effective July 30, 2007. You may visit the FINRA website at www.finra.org.

Tucker Financials Privacy Notice is initially given to all Clients upon signing a Financial Advisor Agreement or an Investment Advisory Agreement and sent to all Clients annually thereafter.

Personal Trading Practices

Tucker Financials Investment Advisor Representatives and/or employees may have an interest in securities or buy, sell, or hold a position in securities, which also can be recommended to the Clients. As a fiduciary, Tucker Financial and its access persons owe its Clients the loyalty to refrain from effecting personal securities transactions that might conflict with the Client's best interests. Conflicts arise when Investment Advisor Representatives, employees, or other access persons take advantage of investment opportunities that should have been exercised for Clients or when they use their knowledge of pending Client transactions to place their trades before their Client's transactions.

Tucker Financial has established the following guidelines to mitigate potential conflicts of interest when placing personal security transactions. Tucker Financials access persons may only effect individual stock transactions on days when there are no Client transactions for the same security, unless their transactions are part of a block trade for the given security (Please refer to the Investment Management Services section of this brochure for Tucker Financials Procedures regarding block trades). Trades found in violation of this policy will be bought or sold out of the access person's account at their expense. There are no restrictions on Investment Advisor Representatives for placing trades in open-end mutual funds on the same day as Clients.

ITEM 12 - BROKERAGE PRACTICES

Recommending Custodians to Clients

Tucker Financials Advisor recommends custodians to their advisory Clients. Some factors in which Tucker Financial considers prior to recommending other custodians include their financial strength, reputation, execution, pricing, research and service. Currently Tucker Financial and its Advisors recommend American Funds, Fidelity Brokerage Services, LLC (Fidelity), SEI Investments, The Vanguard Group, and Charles Schwab & Co., Inc. (Schwab) registered custodians and SIPC members to their Clients.

American Funds, Fidelity, Vanguard, Schwab and SEI maintain custody of all Client's assets and effect trades for Tucker Financials advisory Client's accounts. Tucker Financial is independently owned and operated, and is not affiliated with Fidelity, Vanguard, Schwab, American Funds, or SEI.

Research and Other Soft Dollar Benefits

Even though Tucker Financial and its Advisors recommend American Funds, Fidelity Brokerage Services, LLC (Fidelity), SEI Investments, The Vanguard Group, and Charles Schwab & Co., Inc. (Schwab), they do not receive any soft dollar benefits from them. A soft dollar arrangement is an agreement between the investment advisor and the custodians trading department, where the custodian offers to provide certain products and services pay soft dollars to the investment advisor in exchange for the Investment Advisor Representatives directing trades to the custodian. Using a custodian to purchase research in this manner is a practice susceptible to conflicts of interest - particularly if the custodian trade commissions are costing Clients an additional premium (compared to commissions available from competing brokers). Instead, Tucker Financial uses hard dollars (their own money) to purchase research material.

Tucker Financial may receive other products and services from broker/dealers or custodians that they recommend that benefit Tucker Financial but not Tucker Financials Client's accounts. Some of these other products and services assist Tucker Financial in managing and administering the Client's accounts. These include software and other technology that provide access to Client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple Client accounts); facilitate payment of Tucker Financials fees from it Client's accounts; and assist with back office functions, record keeping and Client reporting. These services may be used to service all or a substantial number of Tucker Financials accounts, including accounts not maintained at Fidelity, American Funds, Schwab, Vanguard, or SEI.

Brokerage for Client Referrals

It is the practice of some broker/dealers to give Client referrals to investment advisors as an incentive for directing business through them. Tucker Financials broker/dealer and custodian do not participate in this business philosophy. Nor does Tucker Financial seek broker/dealers with this business philosophy to recommend to their clients as this would create a conflict of interest.

Directed Brokerage

Tucker Financial may utilize other broker/dealers and custodians when requested by the Client. Tucker Financials Clients must be aware that if they direct Tucker Financial or its Investment Advisor Representatives to use a particular broker/dealer / Custodian that it may limit Tucker Financial or its Investment Advisor Representatives the ability to achieve best execution, negotiate commissions with other brokers on behalf of the Client, or limit the Client's participation in block trading. As a result, Clients may pay higher commissions, have higher transaction cost, or receive less favorable prices.

Best Execution

Tucker Financial routinely compares order execution disclosure information of Fidelity, Schwab, Vanguard, American Funds, or SEI to other broker dealers to ensure that they remain competitive with other broker/dealers in providing best execution for their Client's security transactions. The commissions and/or transaction fees charged by Fidelity, Schwab, American Funds, Vanguard, or SEI may be higher or lower than those charged by other broker-dealers. The commissions paid by Tucker Financials Clients shall comply with Tucker Financials duty to obtain "best execution." However, a Client may pay a commission that is higher than another qualified broker-dealer might charge to affect the same transaction where Tucker Financial determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and services received. 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 broker-dealers' services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while Tucker Financial and/or its Investment Advisor Representatives will seek competitive rates; they may not necessarily obtain the lowest possible commission rates for their Client's transactions.

Block Trades

Tucker Financials Investment Advisor Representatives generally place trades for individual client accounts. However, at the Investment Advisor Representative's discretion, a Client's security transaction order may be combined or "batched" together with other Clients and/or the Investment Advisor Representative's orders and executed as a "block" transaction. By executing block transactions, the Investment Advisor Representatives attempt to achieve best execution and to equitably allocate among their Clients the difference in price that might have been obtained had such orders been placed independently. Sometimes block trades are executed with only a partial fill of the order. This can usually be attributed to limit orders or thinly-traded securities. If this occurs, Tucker Financial has adopted the following guidelines for allocation:

- (a) The shares will be allocated to accounts on a top down basis until all shares have been exhausted. The Investment Advisor Representative may send a fax or an Excel spreadsheet containing the allocation of shares to the trader, who will then allocate the first account and shares, then the second account and shares, etc. If no lots are specified then the custodian will exhaust the shares as a First In First Out basis.
- (b) In the event of varying prices of execution, an average price will be determined and given to Client accounts to ensure price uniformity for all Clients who receive an allocation.
- (c) The Investment Advisor Representative's personal or family account(s) will not receive allocations before a Client's account. If the pre-determined printed allocation has an Investment Advisor Representative's personal or family account(s) listed before a

Client's account, the Investment Advisor Representative's personal or family account(s) will be moved to the end of the list.

(d) Tucker Financial will keep a record of block trades and their allocations.

Transactions Fees

The custodians impose fees to Tucker Financials Clients for securities transactions in their accounts. Clients will pay the custodian for trades based on the following pricing schedules:

American Funds – American Funds charge Clients a \$10 fee to establish a new account. They also charge Client's an annual fee of \$10 per each account held.

Fidelity:

- Mutual Funds:
 - Fidelity NTF No-load Funds – No transaction fee
 - Fidelity Load Funds (select portfolios) – No transaction fee
 - Non-Fidelity NTF No-Load Funds – No transaction fee
 - Non-Fidelity Load Funds at NAV/NTF – No transaction fee
 - Non-Fidelity Load funds – No transaction fee
 - Transaction Fee Funds
 - Individual Trade size – commission (percent of principal)
 - \$25 Flat ticket charge on all buys and sells Non-NTF Funds
 - \$20 Surcharge on Non-Participating Funds on purchases only
 - \$45.00 TF on Vanguard and Dodge & Cox Funds
 - No block trading of mutual funds
- Equities – Manual Trades placed via Trading Desk/Representative:
 - Commission per share - \$.05
 - Minimum Commission per account (regardless of trade size or allocation) - \$29.95
 - Trades Placed Electronically via Wealthscape:
 - Trades placed electronically via Wealthscape will have a rate of \$12.95 minimum ticket charge plus \$0.015 per share for every share over 1000 shares. accounts with \$1 million or more in assets will qualify for pricing of \$8.00 for first 3,000 shares, and \$0.01 per share for every share over 3,000 (electronic trades only).
- ETF's –
 - Trades Placed Electronically via Wealthscape will have a rate of \$4.95 minimum ticket charge.
- Options – Commissions Per Contract - \$2.50
 - Minimum Block Trade Commissions - \$25.00
 - Allocated trades subject to a ten-contract minimum.
- Fixed Income – Principal Business
 - Municipal Bonds – Competitive Basis
 - Government Notes and Bonds – Competitive Basis
 - GNMA's and CMO's – Competitive Basis
 - Corporate Bonds – Competitive Basis
 - Standard Fees

- Government Order of 20 bonds or less - \$50.00
- Government Auction Orders (regardless of size) - \$50.00
- Government Treasury Bills (regardless of size) - \$50.00
- Bonds Traded as Agent
- Other fees – Retirement Account Close-out Fees:
 - IRA - \$75.00 Per Account
 - Keogh - \$75.00 Per Account
 - SEP - \$75.00 Per Account
 - Wire Fee - \$30.00 (if the Online Cashiering Feature is used the wire fee is \$15.00)
 - Over Night fee online is \$8.00
 - Foreign – Securities Transfer Fee – Competitive Basis
 - Check Reorder - \$6.00
 - Short Term Redemption Fees - .50% of the principal amount of the transaction, minimum charge of \$30.00 and maximum of \$200.00
 - Transfer outs – Fidelity charges \$75.00 to close out the account and transfer to another firm.

Schwab:

- Mutual Funds – Flat ticket charge on all buys and sells - \$35.00 thru Schwab-link placed electronically.
 - Broker assisted trades Minimum \$39.00, Max \$74.95.
 - Equities:
 - Account value over \$1 million w. e-delivery - \$4.95 Per Trade thru Schwab-link
 - Account value under \$1 million – not enrolled in e-delivery, \$12.95 thru Schwab-link
 - \$0.015 cents per share for all stocks over the first 1000 shares
 - Account value under \$1 million enrolled in e-delivery
 - \$12.95 for the first 1000 shares
 - \$0.015 cents per share for all stocks over the first 1000 shares
 - ETF's:
 - Trades placed electronically thru Schwab-link \$4.95
 - Options:
 - \$4.95 plus \$.65 per contract
 - If Broker assisted \$38.95 plus \$1.40 per contract, not to exceed \$6.25 per contract or 2% of principal or \$43.95 per leg.
 - Fixed Income:
 - Treasury Bonds, Bills etc – Broker assisted \$25.00
 - Government Agencies – Online \$.20 per bond, \$10 min, \$250 max.
 - Broker Assisted \$.24 per bond \$10 min, \$275 max.
 - Other secondary Fixed Income, CD's etc. - \$1 per bond \$10 min, \$250 max.
 - Broker Assisted \$1.20 per bond, \$10 min, \$275 max.
- **Trades placed thru Schwab Investor Services will be charged an additional \$25 broker assist fee and will be subject to a \$35 minimum and \$275 max. Trades for new issues placed through a broker are not subject to these premiums.
- Other fees
 - Wire Fee - \$25.00

- Over Night Fee - \$8.50
- Transfer Outs – full transfer outs of Schwab to another custodian is \$50.00
- Short Term Redemption Fees - \$49.95

Vanguard – Charges an annual fee of \$15.00 per fund.

SEI – charges \$75.00 per quarter per account.

Mutual Funds generally offer multiple share classes available for investment based upon certain eligibility and/or purchase requirements. They are referred to as Class A, B, and C, etc. and for the investment advisory programs are the institutional share classes. The institutional share classes usually have the lower expenses than the other share classes. Tucker Financial Services, does not receive any compensation from any mutual fund company or share in any transaction charge, 12b-1 fee etc, so there is no incentive for Tucker Financial Services, to recommend either share class, but for the best interest of the client and what is suitable for the client's investment objectives.

Further information regarding fees and expenses is available in the mutual fund prospectus

The Custodians reserve the right to change pricing without notice.

Tucker Financial does not guarantee the future investment performance of the Client's account, or the success of any specific investment strategy or overall management of the Client's investment portfolio.

ITEM 13 - REVIEW OF ACCOUNTS

Formal comprehensive reviews are conducted no more than 12 months subsequent to its prior review. Client's accounts are reviewed during quarterly statements and later reviewed with the Advisor's during client meetings. Tucker Financials Advisors, Christopher J. Jackson reviews and establishes the asset allocation target for Client accounts, and identifies suitable investment choices to replace or add to the Client's investment portfolio. Tucker Financials Investment Advisor Representatives are responsible for monitoring and reviewing their client's accounts. The Chief Compliance Officer or other designated compliance staff monitors the portfolios and financial plans for investment objects and other supervisory reviews.

The Financial Plan is a snapshot in time and no ongoing reviews are conducted. A periodic update to a Financial Plan may be done by the Advisor at the request of the Client or the review may be based on the arrangement between Tucker Financial and the Client. Clients may enter into an ongoing planning arrangement generally on an annual basis or if their investment objectives or financial condition has changed. Tucker Financials Investment Advisor Representatives may perform an other than periodic review for Client's accounts as requested by Client. All investment advisory and financial planning Clients are advised that it remains their responsibility to advise Tucker Financial of any changes in their investment objectives and/or financial situation. All Clients (in person or via telephone) are encouraged to comprehensively review financial planning issues, investment objectives and account performance with Tucker Financials Investment Advisor Representatives at a minimum on an annual basis, or when personal and financial events occur that would change their financial goals and investment objectives.

Clients receive account statements directly from the qualified custodians at least quarterly. The statements from the custodian identify the current balance in each account and any activity that has occurred during the reporting period. Tucker Financials Investment Advisor Representative(s) review Client accounts on a quarterly basis, after which Clients are sent an account statement. Custodian statements show summary of all investment changes and all transactions. Clients are urged to compare the custodial account statements they receive to the written consolidated account statement from Tucker Financial. Minor variations may occur because of reporting dates, accrual methods of interest and dividends, and other factors. The custodial statement is the official record of your account for tax purposes. Any Client that does not receive an account statement from the custodian should call Tucker Financial immediately so that they can correct the problem.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

Tucker Financial predominantly relies on Client referrals to introduce new Clients to their business. It is Tucker Financials policy not to compensate Clients for referring potential Clients to their business, because the Client would be considered a solicitor and would have to satisfy requirements under Rule 206(4)-3 of the Advisers Act before a cash referral fee could be paid to them.

Tucker Financial Services, Inc. and Thomas C. Tucker have entered into a consulting agreement. It is understood during the terms of this agreement that Mr. Tucker will be acting as an Independent Contractor, Consultant. Mr. Tucker will be compensated for any client referrals that he generates for Tucker Financial. For each client referral, Mr. Tucker will be paid 75% of the gross revenue earned from the Referred Client paid on a quarterly basis for eight quarters. Mr. Tucker is also paid 75% quarterly for all consulting fees per Referred Client.

Tucker Financial Services, Inc. and Kira L. Cramer have entered into a compensation arrangement. It is understood that during the Term of this agreement that Miss Cramer will be providing / assisting Tucker Financial Services with creating Financial Plans for clients who have contracted the Financial Planning Service. Miss Cramer will share ½ of all Financial Planning fees that Miss Cramer assists Tucker Financial with creating plans. Miss Cramer is also paid 75% of the gross revenue earned from new business that she generates, paid on a quarterly basis for eight quarters.

Please refer to section titled Fees and Compensation for more information. Such compensation agreements present a conflict of interest and gives TFSI and IARs an incentive to recommend investment products based on the compensation received, rather than on a client's needs.

ITEM 15 - CUSTODY

It is Tucker Financials intention to have custody over Client assets only to the extent that it requests the Client's custodian to deduct advisory fees directly from the Client's account(s). Tucker Financials Investment Advisor Representatives are not permitted to exercise custody in any form over Client assets or accounts.

Tucker Financial has established the following procedures that are designed to help ensure that Tucker Financial does not inadvertently obtain custody of Client assets, other than for the deduction of advisory fees as noted above:

- Tucker Financial will obtain prior written authorization from the Client before deducting advisory fees directly from the Client's account(s).
- Tucker Financial will not hold Client securities in Tucker Financials name or in bearer form.
- Tucker Financial will not require Clients to prepay more than \$500 in fees six months or more in advance.
- Proceeds from sales or redemption of Client securities will not be directed to the custody of Tucker Financial.
- Tucker Financial will not accept signatory power over any Client's checking or custodial account(s).
- Tucker Financials Investment Advisor Representatives may not serve as trustee over a Client's account unless the trust or Client is a family member.
- All wire orders from Client custodial accounts to outside (i.e., non-client) accounts must be accompanied by the Client's written authorization.

As previously noted in the review of Accounts section of this brochure, Clients will receive, at a minimum, monthly/quarterly account statements directly from the custodian of the account. Clients may also receive a written consolidated account statement from Tucker Financial. Clients are urged to compare the custodial account statements they receive to the written consolidated account statement from Tucker Financial. Any Client that does not receive an account statement from the custodian should call Tucker Financial immediately so that the Investment Advisor Representatives can correct the problem.

ITEM 16 - INVESTMENT DISCRETION

Tucker Financials Investment Advisor Representatives are granted limited discretionary authority in writing by the client when the Client signs Tucker Financials Investment Advisory Agreement. This limited discretionary authorization gives Tucker Financials Investment Advisor Representatives the authority to buy, sell, hold, exchange, invest, and otherwise deal with the Client's investment assets at its sole discretion and without consulting with the Client in advance. The Clients have not placed any limitations on Tucker Financial Services discretionary authority. This authorization is perpetual and will remain in full force and effect until the Investment Advisor Representatives receive a written termination notice from the Client.

ITEM 17 - VOTING CLIENT SECURITIES

Tucker Financial and its Investment Advisor Representatives do not vote proxies. They will not take any action on behalf of the Client, and are not obligated to render any advice to the Client, with respect to:

- The voting of proxies solicited by, or with respect to, the issuers of any securities held in the portfolio or,

- The legal proceedings involving securities or other investments presently or formerly held in the portfolio, or the issuers thereof, including bankruptcies.

The Custodian will send all such proxy and legal proceedings information and documents it receives to the Client so that the Client may take whatever action the Client deems appropriate.

ITEM 18 - FINANCIAL INFORMATION

As previously discussed in this brochure, Tucker Financial provides financial planning and investment management services on a discretionary basis for which the Clients are billed quarterly in advance. Clients are never required to prepay planning or management fees to Tucker Financial or its Investment Advisor Representatives more than three months in advance, and prior to 2009 Clients were billed in arrears. However, due to regulations imposed by the Federal Trade Commission, which deemed Tucker Financial to be a creditor, Tucker Financial converted all Clients to prepaying advisory fees in advance.

Neither Tucker Financial nor its Investment Advisor Representatives have ever petitioned or been subject to bankruptcy proceedings, and there are no financial conditions that would prevent Tucker Financial or its Investment Advisor Representatives from meeting any contractual commitment to its Clients.

Principal Executive Officers

Christopher J. Jackson

Christopher J. Jackson was born in 1974.

Mr. Jackson graduated Magna Cum Laude from Shippensburg University, Shippensburg, Pennsylvania, in 1997 with a Bachelor of Science and Business Administration in Accounting. He also earned his AFIM® designation, Accredited Fiduciary Investment Manager through the Cannon Financial Institute which required 3 years of study, three competency tests and a cumulative exam as well as ongoing continuing education.

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

- **Continuing Education** – Complete 12 hours of continuing education every year

Mr. Jackson has passed the following security industry examinations administered by FINRA:

- Uniform Securities Agent State Law Examination – Series 65 on December 27, 2016

Business Experience

The following is a synopsis of Mr. Jackson's business experience:

- 12/2016 – Present – IA Representative of Tucker Financial Services Inc., Chambersburg, PA
- 12/2013 – 12/2016 – Vice President with PNC Wealth Management, CampHill, PA

- 03/2012 – 12/2013 – Chief Investment Officer with Schwab / Team Financial, Shippensburg, PA
- 09/2013 – 12/2013 – IA Representative with Invariant Investment Corporation, Shippensburg, PA
- 02/2001 – 03/2012 – Vice President, Portfolio Manager with Orrstown Bank, Shippensburg, PA
- 06/1998 – 01/2001 – Campus Minister with CCO, Shippensburg, PA
- 01/1998 – 06/1998 – Tax Preparation / Technical Support with Padden & Co, CPA's, Medford, NJ

Mr. Jackson is the Chief Executive Officer of Tucker Financial Services Inc. Mr. Jackson is responsible for all operations of the Firm including, but not limited to, supervision of all Firm employees; adhering to all federal and state security regulations; the execution and supervision of all trading and advisory services provided to Clients.

As an Investment Advisor Representative, Mr. Jackson is responsible for the Client's financial planning and overall management of the Client's portfolio. Based on the Client's financial goals, objectives, and risk tolerance, Mr. Jackson will design a suitable portfolio using a variety of securities and investment strategies to achieve the Client's desired financial goals.

Disciplinary Information

Mr. Jackson has never been involved in any legal or disciplinary actions or administrative proceedings brought before the SEC or any other federal or state regulatory agency.

Other Business Activities

Mr. Jackson is an acting member of the River Road Invest Club. 11 Individuals meet once per month for 2 hours to discuss not only investments but other happenings in the world, community, etc. Mr. Jackson has a small investment with Schwab through this club, on an average there is 1-2 trades placed per month, these trades are placed independently thru the Investment Club and are not placed thru TFSI. If there are any funds that Mr. Jackson owns personally discussed or traded upon he doesn't vote on those funds because it would create a conflict of interest. There are no clients that are members in this group because this would also create a conflict of interest. This business activity represents approximately 1% of Mr. Jackson's time.

Mr. Jackson is an active member of the Shippensburg University Finance Advisory Council (SUFAC). This council provides advice, and recommends financial advice to the finance faculty, finance students and college business admin within the financial industry. They meet twice a year. The senior students manage a small stock portfolio; Mr. Jackson doesn't give any advice on specific investments but does give advice on the asset allocation for the portfolio. This is for the benefit of the foundation scholarship fund. He doesn't receive any compensation for his time.

This business activity represents approximately 1% of Mr. Jackson's time.

Mr. Jackson is the Founder, President of the University Comm. Ministries Program. This is a non-profit campus ministry program for Shippensburg Students. He receives no compensation

for his time. He does actively oversee the board and the campus ministry staff. All funds run through an Independent 501C3.

This business activity represents approximately 3% of Mr. Jackson's time.

Mr. Jackson is actively involved on the Board of the Central Manor Camp Meeting. He is not compensated for his time but he does indirectly manage the investments of the committee, (he does not place trades). Vanguard has custody of the funds they are all mutual funds.

He serves on various committees, ex: worship committee.

This business activity represents approximately 1% of Mr. Jackson's time.

Additional Compensation

Mr. Jackson / Tucker Financial Services, Inc. have entered into a compensation arrangement with Thomas C. Tucker. It is understood during the Term of this agreement that Mr. Tucker will be acting as an Independent Contractor, Consultant. Mr. Tucker, Consultant, will be compensated for any client referrals that he generates for Christopher Jackson, Tucker Financial Services, Inc. For each client referral, Mr. Tucker is paid 75% of the gross revenue earned from the Referred Client, paid on a quarterly basis for eight quarters per Referred Client. Referred Clients are defined are not to include any that are introduced through an already acquired Client.

Supervision

Christopher J. Jackson formulates his own investment advice. Joanna St.Clair, Chief Compliance Officer, monitors portfolios for investment objectives and other administrative supervisory reviews. These supervisory reviews include suitability, best execution, investment objectives, allocations, trading; statement reviews, personal transaction reviews and any other reviews that are applicable to Tucker Financial Services, Inc. Joanna St.Clair may be contacted at (717) 267-1426.

TUCKER FINANCIAL SERVICES, INC.

425 Phoenix Drive

Chambersburg, PA 17201

(717) 267-1426

(717) 267-1584 Fax

chris@tuckerfinancialservices.com

www.tuckerfinancialservices.com

Registered Investment Advisory Services

Firm Brochure Supplement Part 2B of Form ADV Updated January 1, 2018

Name of Supervised Person/IA Rep	Christopher Joseph Jackson
Address	425 Phoenix Drive, Chambersburg, PA 17201
Phone Number	717-267-1426
Date of Last Revision	January 1, 2018

Name of Registered Investment Advisor	Tucker Financial Services, Inc.
Address	425 Phoenix Drive, Chambersburg, PA 17201
Phone Number	717-267-1426
Website Address	www.tuckerfinancialservices.com

This Brochure Supplement provides information about Christopher J. Jackson that supplements the Tucker Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Joanna St.Clair, CCO or Colleen Browell, COO if you did not receive Tucker Financial Services' brochure or if you have any questions about the contents of this supplement.

Additional information about Christopher J. Jackson is available on the SEC's website at:
www.adviserinfo.sec.gov

Christopher J. Jackson

Christopher J. Jackson was born in 1974.

Mr. Jackson graduated Magna Cum Laude from Shippensburg University, Shippensburg, Pennsylvania, in 1997 with a Bachelor of Science and Business Administration in Accounting. He also earned his AFIM® designation, Accredited Fiduciary Investment Manager through the Cannon Financial Institute which required 3 years of study, three competency tests and a cumulative exam as well as ongoing continuing education.

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

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- 01/1998 – 06/1998 – Tax Preparation / Technical Support with Padden & Co, CPA's, Medford, NJ

Mr. Jackson is the Chief Executive Officer of Tucker Financial Services Inc. Mr. Jackson is responsible for all operations of the Firm including, but not limited to, supervision of all Firm employees; adhering to all federal and state security regulations; the execution and supervision of all trading and advisory services provided to Clients.

As an Investment Advisor Representative, Mr. Jackson is responsible for the Client's financial planning and overall management of the Client's portfolio. Based on the Client's financial goals, objectives, and risk tolerance, Mr. Jackson will design a suitable portfolio using a variety of securities and investment strategies to achieve the Client's desired financial goals.

Disciplinary Information

Mr. Jackson has never been involved in any legal or disciplinary actions or administrative proceedings brought before the SEC or any other federal or state regulatory agency.

Other Business Activities

Mr. Jackson is an acting member of the River Road Invest Club. 11 Individuals meet once per month for 2 hours to discuss not only investments but other happenings in the world, community, etc. Mr. Jackson has a small investment with Schwab through this club, on an average there is 1-2 trades placed per month, these trades are placed independently thru the Investment Club and are not placed thru TFSI. If there are any funds that Mr. Jackson owns personally discussed or traded upon he doesn't vote on those funds because it would create a conflict of interest. There are no clients that are members of this group.

This business activity represents approximately 1% of Mr. Jackson's time.

Mr. Jackson is an active member of the Shippensburg University Finance Advisory Council (SUFAC). This council provides advice, and recommends financial advice to the finance faculty, finance students and college business admin within the financial industry. They meet twice a year. The senior students manage a small stock portfolio; Mr. Jackson doesn't give any advice on specific investments but does give advice on the asset allocation for the portfolio. This is for the benefit of the foundation scholarship fund. He doesn't receive any compensation for his time.

This business activity represents approximately 1% of Mr. Jackson's time.

Mr. Jackson is the Founder, President of University Community Ministries (UnComMin). This is a non-profit campus ministry program for Shippensburg Students. He receives no compensation for his time. He does actively oversee the board and the campus ministry staff. All funds run through an Independent 501C3.

This business activity represents approximately 3% of Mr. Jackson's time.

Mr. Jackson is actively involved on the Board of the Central Manor Camp Meeting. He is not compensated for his time but he does give the committee recommendations on the funds that they hold, (he does not place trades). Vanguard has custody of the funds and they are all mutual funds.

He serves on various committees, ex: worship committee.

This business activity represents approximately 1% of Mr. Jackson's time.

Additional Compensation

Mr. Jackson / Tucker Financial Services, Inc. have entered into a compensation arrangement with Thomas C. Tucker. It is understood during the Term of this agreement that Mr. Tucker will be acting as an Independent Contractor, Consultant. Mr. Tucker, Consultant, will be compensated for any client referrals that he generates for Christopher Jackson, Tucker Financial Services, Inc. For each client referral, Mr. Tucker is paid 75% of the gross revenue earned from the Referred Client, paid on a quarterly basis for eight quarters per Referred Client. Mr. Tucker is also paid 75% of quarterly for Consulting Fees per Referred Client. Referred Clients are defined are not to include any that are introduced through an already acquired Client.

Mr. Jackson / Tucker Financial Services, Inc. have entered into a compensation arrangement with Kira L. Cramer. It is understood that during the Term of this agreement that Miss Cramer will be providing / assisting Mr. Jackson with creating Financial Plans for clients who have contracted the Financial Planning Service. Miss Cramer will share ½ of all Financial Planning fees that Miss Cramer assists Mr. Jackson / Tucker Financial Services, Inc. with creating Financial Plans. Miss Cramer is also paid 75% of the gross revenue earned from new business that she generates, paid on a quarterly basis for eight quarters.

Supervision

Christopher J. Jackson formulates his own investment advice. Joanna St.Clair, Chief Compliance Officer, monitors portfolios for investment objectives and other administrative supervisory reviews. These supervisory reviews include suitability, best execution, investment objectives, allocations, trading; statement reviews, personal transaction reviews and any other reviews that are applicable to Tucker Financial Services, Inc. Joanna St.Clair may be contacted at (717) 267-1426.

TUCKER FINANCIAL SERVICES, INC.

425 Phoenix Drive

Chambersburg, PA 17201

(717) 267-1426

(717) 267-1584 Fax

tuckerfs@tuckerfinancialservices.com

www.tuckerfinancialservices.com

Registered Investment Advisory Services

Firm Brochure Supplement Part 2B of Form ADV Updated January 1, 2018

Name of Supervised Person/IA Rep	Thomas C. Tucker
Address	425 Phoenix Drive, Chambersburg, PA 17201
Phone Number	717-267-1426
Date of Last Revision	January 1, 2018

Name of Registered Investment Advisor	Tucker Financial Services, Inc.
Address	425 Phoenix Drive, Chambersburg, PA 17201
Phone Number	717-267-1426
Website Address	www.tuckerfinancialservices.com

This Brochure Supplement provides information about Thomas C. Tucker that supplements the Tucker Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Joanna St.Clair, CCO or Colleen Browell, COO if you did not receive Tucker Financial Services' brochure or if you have any questions about the contents of this supplement.

Additional information about Thomas C. Tucker is available on the SEC's website at:
www.adviserinfo.sec.gov

Thomas C. Tucker, CFP®

Thomas C. Tucker was born in 1947.

Mr. Tucker graduated from Frostburg University, Frostburg Maryland, in 1968 with a Bachelor of Arts Degree in Elementary Education, and is a graduate of the College of Financial Planning. In 1984, Mr. Tucker received authorization to use the Certified Financial Planner (CFP®) marks from the Certified Financial Planner Board of Standards, Inc. (“CFP Board”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and the federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by the 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 a 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 the 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 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, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s abilities 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 2000 hours per year).
- **Ethics** – Agree to be bound by CFP Board’s *Standard 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 the use of 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.
- **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 interest 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.

Mr. Tucker has passed the following security industry examinations administered by FINRA:

- Investment Company Products/Variable Contracts Representative Examination – Series 6 on October 10, 1977
- General Securities Representative Examination – Series 7 on December 19, 1982
- General Securities Principal Examination – Series 24 on November 25, 1994
- Uniform Securities Agent State Law Examination – Series 63 on November 10, 1980

Mr. Tucker has met the educational requirements and passed the required examination administered by the State of Pennsylvania's Insurance Department to sell life, health and variable insurance products within the state.

Business Experience

The following is a synopsis of Mr. Tucker's business experience:

- 01/2017 – Present – IA Representative of Tucker Financial Services, Inc., Chambersburg, PA
- 04/1983 – 12/2016 – CEO, IA Representative of Tucker Financial Services Inc., Chambersburg, PA
- 05/2004 – 09/2012 – Registered Representative with Purshe Kaplan Sterling Investments, Albany, NY
- 09/1989 – 05/2004 - Registered Representative with Main Street Management, Wallingford, CT
- 02/1991 – 04/1991 - Registered Representative with PEB Financial Group, Inc., Chicago, IL
- 11/1989 – 12/1989 - Registered Representative with PEB Financial Group, Inc., Chicago, IL
- 1987 – 1989 – Registered Representative with Planners Securities Group, Atlanta, GA
- 1985 – 1987 – Registered Representative with FSC Securities Corp, Atlanta, GA
- 1983 – 1985 – Registered Representative with American Capital, Kansas City, MO
- 1981 -1983 - Registered Representative with Merrill, Lynch, Pierce, Fenner, and Smith
- 1977 – 1981 - Insurance Agent with New England Life, Boston, MA

As an Investment Advisor Representative, Mr. Tucker is responsible for the Client's financial planning and overall management of the Client's portfolio. Based on the Client's financial goals, objectives, and risk tolerance, Mr. Tucker on occasion will design a suitable portfolio using a variety of securities and investment strategies to achieve the Client's desired financial goals.

Disciplinary Information

Mr. Tucker has never been involved in any legal or disciplinary actions or administrative proceedings brought before the SEC or any other federal or state regulatory agency.

Other Business Activities

Mr. Tucker does not have any other Business activities to list at this time.

Additional Compensation

Mr. Tucker has entered into a consulting agreement between himself and Christopher Jackson and the company Tucker Financial Services, Inc. It is understood during the Term of this agreement that Mr. Tucker will be acting as an Independent Contractor, Consultant. Mr. Tucker, Consultant, will be compensated for any client referrals that he generates for Christopher Jackson, Tucker Financial Services, Inc. For each client referral, Mr. Tucker is paid 75% of the gross revenue earned from the Referred Client, paid on a quarterly basis for eight quarters per Referred Client. Mr. Tucker is also paid 75% quarterly for Consulting fees per Referred Client. Referred Clients are defined are not to include any that are introduced through an already acquired Client.

Supervision

Thomas C. Tucker formulates his own investment advice. Joanna St.Clair, Chief Compliance Officer, monitors portfolios for investment objectives and other administrative supervisory reviews. These supervisory reviews include suitability, best execution, investment objectives, allocations, trading; statement reviews, personal transaction reviews and any other reviews that are applicable to Tucker Financial Services, Inc. Joanna St.Clair may be contacted at (717) 267-1426.

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425 Phoenix Drive

Chambersburg, PA 17201

(717) 267-1426

(717) 267-1584 Fax

kramer@tuckerfinancialservices.com

www.tuckerfinancialservices.com

Registered Investment Advisory Services

Firm Brochure Supplement Part 2B of Form ADV Updated January 1, 2018

Name of Supervised Person/IA Rep	Kira Lee Cramer
Address	425 Phoenix Drive, Chambersburg, PA 17201
Phone Number	717-267-1426
Date of Last Revision	January 1, 2018

Name of Registered Investment Advisor	Tucker Financial Services, Inc.
Address	425 Phoenix Drive, Chambersburg, PA 17201
Phone Number	717-267-1426
Website Address	www.tuckerfinancialservices.com

This Brochure Supplement provides information about Kira Lee Cramer that supplements the Tucker Financial Services, Inc. brochure. You should have received a copy of that brochure. Please contact Joanna St.Clair, CCO or Colleen Browell, COO if you did not receive Tucker Financial Services' brochure or if you have any questions about the contents of this supplement.

Additional information about Kira Lee Cramer is available on the SEC's website at:
www.adviserinfo.sec.gov

Kira Lee Cramer

Kira Lee Cramer was born in 1987.

Kira Lee Cramer graduated from Shippensburg University, Shippensburg, Pennsylvania, in 2010 with a Bachelor of Arts in Communication / Journalism with the emphasis being on Public Relations and a Minor in Human Communication Studies.

- **Continuing Education** – Miss Cramer completes all continuing education as required.

Miss Cramer has passed the following security industry examinations administered by FINRA:

- Uniform Investment Adviser State Law Examination – Series 65 on March 7, 2016
- Uniform Securities Agent State Law Examination – Series 63 on July 7, 2014
- Investment company Products / Variable Contracts Examination – Series 6 on May 27, 2014

Business Experience

The following is a synopsis of Miss Cramer's business experience:

- 01/2017 – Present – IA Representative / Financial Planner & Communications Consultant of Tucker Financial Services Inc., Chambersburg, PA
- 11/2013 – 01/2017 – Financial Advisor, Cool Hollow Financial, Chambersburg, PA
- 02/2013 – 10/2013 – District Sales Manager, Gold's Gym, Chambersburg, PA
- 02/2011 – 02/2013 – Advertising Sales Executive, Lee Enterprises, The Sentinel, Shippensburg, PA

Miss Cramer has met the educational requirements and passed the required examination administered by the State of Pennsylvania's Insurance Department to sell life, health and variable insurance products within the state.

As an Investment Advisor Representative, Miss Cramer is responsible for the Client's financial planning and overall management of the Client's portfolio. Based on the Client's financial goals, objectives, and risk tolerance, Miss Cramer will design a suitable portfolio using a variety of securities and investment strategies to achieve the Client's desired financial goals.

Disciplinary Information

Miss Cramer has never been involved in any legal or disciplinary actions or administrative proceedings brought before the SEC or any other federal or state regulatory agency.

Other Business Activities

Miss Cramer is the President of the Franklin Country Business Referral Group. She will lead the bi-monthly group meetings and help to develop the group and generate referrals through 2018 after which a new President will be elected. Miss Cramer does represent Tucker Financial Services, Inc. in the group and holds the Wealth Management/Financial Planning category in the group.

This business activity represents approximately 1% of Miss Cramer's time.

Miss Cramer is the Co-Chair and Secretary of the Franklin County Women's Conference; a group that develops an annual conference for local women to benefit the local non-profit, Women In Need. She leads the committee and organizes communications and operations.

This business activity is non-investment related and represents approximately 1% of Miss Cramer's time

Miss Cramer is licensed as an insurance product agent. As an insurance product agent, Miss Cramer is "able" to sell insurance products to Clients with those needs and may receive separate and standard commissions for the sale of those products. Thus a conflict of interest exists between Miss Cramer and those Clients desiring insurance products. The Client is under no obligation to purchase products recommended, or to purchase products either through Miss Cramer or through the companies that Miss Cramer has appointments with.

These business activities represent approximately 1% of Miss Cramer's time.

Additional Compensation

Miss Cramer and Christopher Jackson will share ½ of all Financial Planning fees that Miss Cramer provides or assists Mr. Jackson with creating Financial Plans for clients who have contracted the Financial Planning Service. Miss Cramer is also paid 75% of the gross revenue earned from new business that she generates, paid on a quarterly basis for eight quarters.

Supervision

Kira Lee Cramer formulates her own investment advice. Joanna St.Clair, Chief Compliance Officer, monitors portfolios for investment objectives and other administrative supervisory reviews. These supervisory reviews include suitability, best execution, investment objectives, allocations, trading; statement reviews, personal transaction reviews and any other reviews that are applicable to Tucker Financial Services, Inc. Joanna St.Clair may be contacted at (717) 267-1426.