

Introduction

Financial Life Advisors is registered with the Securities and Exchange Commission (SEC) as an investment adviser. The fees and charges differ between investment advisory and brokerage services and from firm to firm. It is important for you to understand these differences. There are free and simple tools available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer a variety of investment advisory services, including comprehensive financial planning, investment management, consulting, business succession, and exit planning services to individuals, high net worth individuals, trusts, estates, charitable organizations, corporations, retirement plans, and other business entities.

Under ongoing investment management arrangements, we will offer you advice on a regular basis. We will discuss your investment goals, design with you a strategy to achieve your investment goals, and regularly monitor your account(s). We will contact you at least annually to discuss your portfolio.

We primarily recommend that you choose an account that allows us to buy and sell investments in your account without asking you in advance (a “discretionary account”). On a limited basis, we can accommodate an account where we may give you advice and you decide what investments to buy and sell (a “non-discretionary account”).

We do not offer proprietary products, nor do we restrict our advice to a limited group or type of investment. Instead, we recommend investment portfolios designed to be suitable for each client relative to that client’s specific circumstances and needs.

We do not have a minimum account size, but we do have a minimum monthly fee, therefore our investment advisory services may not be in your best interest if your account is below a certain level.

Additional information. Please see our firm brochure (Form ADV, Part 2A), Items 4 and 7 for more information. This document can be found at <https://adviserinfo.sec.gov/firm/summary/128502>.

Conversation Starters: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

What fees will I pay?

Financial Planning: A written agreement will be given that will cover all prices and terms before the commencement of our services. We typically quote fees for comprehensive plans on a binding fixed fee basis. The time required to complete each project varies widely based upon individual circumstances but generally, fees range from \$2,000 to \$10,000 for a comprehensive plan. Occasionally, we cannot accurately estimate the time involved and will offer an hourly agreement at rates based on the team member involved.

Investment Management: We are only paid by the client directly. Our investment advisory accounts are billed a monthly ongoing fee in arrears with a tiered schedule based on the market value of the assets under management at the end of the period. The amount paid to our firm does not vary based on the type of investments selected.

Our annual fee percentage for assets under management declines after meeting certain breakpoints. We offer different tier schedule agreements based on the complexity and additional services required to meet

your needs. Accounts may be grouped as a “Household” which adds the total assets together, potentially allowing for some of those assets to be billed at lower rates. See our firm brochure ADV Part 2A Item 5 for detailed fee schedules.

We will assist you in placing your assets with a qualified custodian that may charge additional fees that will reduce the value of your investments over time. Also, investments (such as mutual funds and exchange traded funds) may impose additional internal expense fees.

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

**What are your legal obligations to me when acting as my investment adviser?
How else does your firm make money and what conflicts of interest do you have?**

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

We have a conflict of interest around making a recommendation to pay down a debt that would reduce the level of assets being managed. The more assets you have in your advisory account(s), including cash, the more you will pay us. Also, you will pay our fee monthly, even if we do not initiate any transactions such as a buy or sell.

We have no revenue sharing arrangements, nor do any trading directly from our own account with clients.

Additional information. Please see Form ADV, Part 2A brochure and other applicable documents. Go to <https://fladvisors.com/disclosures/>.

Conversation Starters: How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

Our financial advisors are compensated based on a salary that is determined by their level of experience and expertise. The amount paid to our firm and your financial professional does not vary based on the type of investments we select on your behalf.

Do you or your financial professionals have legal or disciplinary history?

No. We do not have any legal or disciplinary events to report. Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

Conversation Starters: As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

For additional information about our services, see our website <https://fladvisors.com/disclosures/>. If you would like additional, up-to-date information, or a copy of this disclosure, please email compliance@fladvisors.com or call (210) 918-8998.

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

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Client Brochure



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San Antonio, TX 78248

(210) 918-8998
www.fladvisors.com

September 1, 2025

This brochure provides information about the qualifications and business practices of Financial Life Advisors. If you have any questions about the contents of this brochure, you may contact us at (210) 918-8998 or email compliance@fladvisors.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

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

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Item 2-Material Changes

This Brochure dated September 1, 2025, contains a summary of material changes since the last annual update of the Financial Life Advisors' Brochure dated March 1, 2024:

Financial Life Advisors has made no material changes to this Brochure since the last update.

In the future, any additional material changes that occur during the year will be reported here.

A copy of our brochure may be requested by contacting our office at (210) 918-8998, or by email to compliance@fladvisors.com. This brochure is also available on our website, www.fladvisors.com, and the SEC website www.adviserinfo.sec.gov.

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Item 4- Advisory Business

- A.** Financial Life Advisors (“FLA” “we” and “Advisors”) is a Texas limited liability company with its principal place of business located in San Antonio, Texas. The firm is owned by KFBG Holdings, LLC, which is owned jointly by Benjamin D. Gurwitz and Kirk W. Francis. FLA has been in business since November 21, 2003.
- B.** FLA is an investment advisor providing comprehensive financial planning, consulting, and investment management services to individuals, high net worth individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other business entities.

We offer Clients a comprehensive approach to investment and wealth management, which may include, depending on a client’s needs, the following major areas:

- Development of financial plans that match the Client’s goals
- Tailored investment portfolios consistent with our Clients’ plans
- Financial Independence/Retirement Planning
- Assessment of risk management (including insurance needs)
- Analysis of existing assets and investments
- Investment selection, portfolio design, and portfolio implementation
- Fiduciary Consulting for 401(k) Plans
- Consultation and advisory services related to estate planning, education funding, risk management, retirement planning, business succession planning, and other specialized areas

Prior to engaging us to provide any of the foregoing financial planning and investment advisory services, Clients are required to enter into one or more written agreements setting forth the terms and conditions under which we shall render our services. These agreements describe the scope of services to be provided and the portion of the fee that is due from the Client prior to FLA commencing services. For more information about our fees, please see Item 5 of this document.

- C.** Our financial planning and investment advisory services are driven by and coordinated with each Client’s individual financial goals. Our advice and services are tailored to the stated objectives of each Client. Financial plans, advice, and

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strategy are designed by incorporating each Client's circumstances. This process serves as the foundational roadmap for the investment portfolio. Developing and consistently adhering to an investment policy allows our clients to focus on the long-term goals of their financial plan, rather than become caught up in the short-term movements of the equity markets.

The Client can impose certain written restrictions on how their assets are managed.

Each Client is advised that it remains their responsibility to notify FLA promptly when there is a change in their financial situation and/or investment objectives so that FLA is prepared to review, evaluate, and revise previous recommendations and/or services.

- D.** FLA does not participate in a wrap-fee program.
- E.** As of December 31, 2024, FLA managed \$292,549,408 of Client assets on a discretionary basis and \$53,204,755 of Client assets on a non-discretionary basis for a total of \$345,754,163.

Item 5-Fees and Compensation

- A.** Depending upon the engagement, we offer our services on a fee basis which may include, a percentage of the assets managed, hourly and/or fixed fees.

FLA provides in a broad range of comprehensive planning and consulting services. For these services, we charge a fixed fee and/or hourly fee. Depending upon the complexity and length of the engagement, our personal planning and consulting fees usually range from \$2,000 to \$10,000; and our 401(k) fiduciary consulting service fees range from \$6,000 to \$25,000. These services are also available on an hourly basis at the rate of \$100 to \$400 depending upon the level and scope of the services and the professional rendering the financial planning and/or the consulting services.

Compensation for FLA's investment advisory services will be in accordance with one of our Investment Advisory Agreements (IAA) that each Client enters into at the beginning of our professional relationship. The IAA may be amended from time to time upon written notice to our Clients.

FLA maintains several investment management models and fee schedules in order to meet clients' needs.

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Model 1 (Includes financial planning services & portfolio customization not included in Model 2)

Fees for this model are generally billed monthly in arrears and are based on the total value of the assets under management at the end of the billing period. The fee will be equal to the agreed upon rate per annum (again, as set-forth in the IAA entered into each Client), times the market value of the account, divided by (12) monthly billing or (4) for quarterly billing. The market value will be construed to equal the sum of the values of all assets in the account as provided by the account(s) custodian(s), not adjusted by any margin debit. Any other securities or investments in the portfolio shall be valued in a manner determined in good faith to reflect fair market value. Any such valuation should not be considered a guarantee of any kind whatsoever with respect to the value of the assets in the portfolio.

Fees for partial months (due to commencement or termination of the advisory relationship) will be billed or refunded on a pro-rated basis contingent on the number of days the account was open during the month. Further, deposits or withdrawals in excess of \$100,000 per transaction will be pro-rated based on the number of days the funds were in the account for that period.

MODEL 1 ANNUAL FEE SCHEDULE

- 1.15% for up to \$1,000,000 of assets under management
- 0.75% for the next \$1,000,000 of assets under management
- 0.65% for the next \$1,000,000 of assets under management
- 0.55% for the next \$2,000,000 of assets under management
- 0.35% for the remaining assets above \$5,000,000 of assets under management

All Accounts under this fee model are subject to a minimum monthly Management Fee of \$958.33. Accordingly, this model may not be appropriate for clients with total household accounts of less than \$1,000,000. The minimum fee for investment advisory services may be reduced or waived at the sole discretion of Financial Life Advisors.

Notwithstanding the above, our financial planning and investment advisory fees are negotiable at the discretion of our investment advisor representatives based on the level of complexity and service offered.

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Model 2 (Generally does not include any financial planning or portfolio customization)

Fees for this model are generally billed monthly in arrears and are based on the total value of the assets under management during the billing period. The fee will be equal to the agreed upon rate per annum (again, as set-forth in the IAA entered into each Client), times the market value of the account, divided by (12) monthly billing or (4) for quarterly billing. The market value will be construed to equal the sum of the values of all assets in the account, as provided by the account(s) custodian(s) not adjusted by any margin debit. Any other securities or investments in the portfolio shall be valued in a manner determined in good faith to reflect fair market value. Any such valuation should not be considered a guarantee of any kind whatsoever with respect to the value of the assets in the portfolio.

Fees for partial months (due to commencement or termination of the advisory relationship) will be billed or refunded on a pro-rated basis contingent on a number of days the account was open during the month. Further, deposits or withdrawals in excess of \$100,000 per transaction will be pro-rated based on the number of days the funds were in the account for that period.

MODEL 2 ANNUAL FEE SCHEDULE

- 0.65% for up to \$1,000,000 of assets under management
- 0.60% for the next \$1,000,000 of assets under management
- 0.50% for the next \$3,000,000 of assets under management
- 0.40% for the remaining assets above \$5,000,000

All Accounts under this fee model are subject to a minimum monthly Management Fee of \$81.25. Accordingly, this model may not be appropriate for clients with total household accounts of less than \$150,000. The minimum fee for investment advisory services may be reduced or waived at the sole discretion of Financial Life Advisors.

Notwithstanding the above, our financial planning and investment advisory fees are negotiable at the discretion of our investment advisor representatives based on the level of complexity and service offered.

Model 3 (Legacy accounts)

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Some clients who were with FLA or Cross Financial Services Corporation d/b/a FLA previously may be on a different fee schedule and/or have different services previously offered or negotiated. New clients are no longer offered these options.

- B.** Clients authorize the custodian to deduct FLA's investment advisory fees from the Client account(s). Each calendar month or quarter, depending on the billing Model, we will submit a bill to the custodian for our investment advisory fees. The custodian is authorized to pay to FLA upon submission of this bill. Clients acknowledge that the custodian will not verify advisor's fee calculation and that it is Client's responsibility to review advisor's fee to ensure that fees were calculated accurately.

Payment of fees may result in the liquidation of a Client's securities if there is insufficient cash in the account. Fees are assessed on all assets in the account(s), including securities, cash and money market balances. Margin debits do not reduce the value of the assets billed in the account; therefore, billing will be on the gross balance before subtracting the margin balance.

If requested, a client may be billed directly for the fees incurred on a monthly or quarterly basis instead of directly deducted from the custodian account.

- C.** Clients may also incur certain charges imposed by third-parties in connection with investments made in the account(s), including (but not necessarily limited to) the following types of charges: investment managers, mutual fund management fees and administrative servicing fees, mutual fund 12b-1 fees, certain deferred sales charges on previously purchased mutual funds, clearing, custody, postage and handling, other transaction charges and service fees (i.e. account transfer fees, wire transfer fees, termination fees, etc.), interest on debit balances (margin), IRA and Qualified Retirement Plan fees, and other costs or charges with securities transactions mandated by law. Further information regarding charges and fees assessed by a mutual fund or other securities sponsors is available in the appropriate prospectus or disclosure statement.
- D.** Fees are refunded as detailed in A above. Clients may terminate the agreement upon thirty (30) days written notice that is sent or delivered to FLA. Similarly, FLA may terminate the agreement and resign at any time within thirty (30) days' notice by sending a written notice to the Client at the address on file with FLA. Client is responsible for all unpaid fees or charges due through the date of termination.

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

We do not charge performance-based fees for our services. Accordingly, this item is not applicable to our firm.

Item 7-Types of Clients

FLA's Clients are individuals, high net worth individuals, defined benefit plans/pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other business entities.

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

- A.** We offer advice on investments including but not limited to the following:
- Equity securities such as:
 - Exchange-listed securities
 - Securities traded over-the-counter
 - Corporate debt securities
 - Municipal securities
 - Investment company securities such as mutual fund shares
 - United States government securities

FLA may also provide advice about any type of investment held in the Client's portfolio at the beginning of or throughout the advisory relationship, for example, warrants, margin transactions, and options contracts on securities. We primarily research and review securities using fundamental, technical, and cyclical analysis. The primary investment strategies used to implement investment advice given to Clients include long-term purchases (securities held at least one year), and trading (securities sold within 30 days).

The main sources of information we rely upon when researching and analyzing securities include materials and resources such as financial publications, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases. Investing in securities involves risk of loss that clients should be prepared to bear while engaging our services.

The development and maintenance of some FLA Models, is materially supported by BlackRock Fund Advisors and/or its affiliates, including BlackRock

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Investments, LLC (collectively, “BlackRock”), which provides FLA with investment research, model recommendations and marketing support at no cost. Research and recommendations provided by BlackRock to FLA, however, favor the use of iShares ETFs, which are distributed by BlackRock. While FLA is under no obligation to utilize iShares ETFs in the management of the FLA Models. This relationship creates a material conflict of interest for FLA as the receipt of such services from BlackRock reduces FLA’s operating costs, which creates an incentive for FLA to recommend and utilize products sponsored or distributed by BlackRock in the management of all client accounts. FLA addresses these conflicts of interest by (1) providing disclosure of the relationship and the associated conflicts of interest to clients in this Brochure and (2) reminding clients that they can impose reasonable restrictions on the securities or types of securities to be held in their portfolios, including a restriction on the purchase and/or use of investment products associated with BlackRock.

- B.** Clients understand and accept that all investments are subject to risk, changing market conditions and that losses in the principal amount of the account are possible. Past performance is no guarantee of future results. We will use our best judgment and good faith efforts in rendering services to our Clients. However, we cannot warrant or guarantee any particular level of account performance, or that the account will be profitable over time. Not every investment decision or recommendation made by us will be profitable. Clients assume all market risk involved in the investment of account assets and understand that investment decisions made for their account(s) are subject to various market, currency, economic, political, and business risks.

Except as may otherwise be provided by applicable federal or state law, we are not liable to Clients for:

- Any loss that a Client may suffer by reason of any investment decision made or other action taken or omitted in good faith by us with that degree of care, skill, prudence, and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use;
- Any loss arising from our adherence to a Client’s instructions; or
- Any act or failure to act by a custodian of a Client’s account.

However, nothing shall relieve us from any responsibility or liability we may have under state or federal statutes. It is the responsibility of each Client to give us complete information and to notify us of any changes in their financial circumstances or goals.

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- C. Mutual Funds and Exchange Traded Funds (ETFs)** – An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual funds and ETFs are subject to secondary market trading risks. Shares of mutual funds and ETFs will be listed for trading on an exchange, however, there can be no guarantee that an active trading market for such shares will develop or continue. There can be no guarantee that a mutual funds' and ETFs' exchange listing or ability to trade its shares will continue or remain unchanged. Shares of the mutual fund or ETF may trade on an exchange at prices at, above or below their most recent net asset valuation (NAV), which is the price that an investor would buy or sell the mutual fund or ETF at. The per share NAV of a mutual fund or ETF is calculated at the end of each business day and fluctuates with changes in the market value of the mutual fund's or ETF's holdings. The trading prices of a mutual fund's or ETF's shares may differ significantly from NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's ETF's shares trading at a premium or discount to NAV.

Options – FLA may recommend the use of options for certain clients. Options allow FLA to hedge (limit) certain losses on positions clients hold. Options also can offer opportunities with call option premium (covered calls) on securities the client holds. The option allows FLA to buy or sell a security at a certain price (not the current market price). Clients pay a fee for the options. If the option falls outside the money (i.e., the market price of the security does not justify purchasing/selling the security at the option price), the client will lose the fee for that option.

Margin – In the event that the account uses margin, fluctuations in the market value of the portfolio will have a significant effect in relation to the account's capital and the risk of loss and the possibility of gain will each be increased. In addition, when the account uses margin, the level of interest rates generally, and the rates at which the account can borrow will be an expense of the account (client) and therefore affect the results. Margin increases the risk of substantial losses (including the risk of a total loss of capital), and leverage can significantly magnify the volatility of the portfolio.

The account may use short-term margin borrowing. Such borrowing, if made, may result in certain additional risks to the account. For example, should the securities pledged to brokers to secure the margin accounts decline in value, the account could be subject to a "margin call" pursuant to which the account would be required to either deposit additional funds with the broker or suffer mandatory liquidation of the pledged securities to compensate for the decline in value. In the

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event of a sudden, precipitous drop in value of the account's assets, the account might not be able to liquidate assets quickly enough to pay off its margin debt.

Item 9- Disciplinary Information

We are required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of our firm, or the integrity of our management. We have no information to disclose that is applicable to this Item.

Item 10- Other Financial Industry Activities and Affiliations

- A.** Neither FLA nor any of our management persons are registered, or have an application pending to register, as a broker-dealer, or a registered representative of a broker-dealer.
- B.** Neither FLA nor any of our management persons are registered, or have an application pending to register, as a future commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.
- C.** Some of FLA's associated persons, in their individual capacities, may serve as expert witnesses on investment-related issues as well as for issues such as financial planning, ethics, and insurance. FLA's associated person will charge a separate fee for these services which shall be agreed upon prior to rendering the services. FLA does not anticipate that this relationship will pose any potential conflict of interest with FLA's Clients.

Item 11- Code of Ethics, Participation or Interest in Client Transaction & Personal Trading

- A.** FLA has adopted a Code of Ethics and Personal Trading Policy and has established standards of conduct expected of its advisory personnel. In our Compliance Manual and the Code of Ethics, we have set forth general principles, required course of conduct, reporting obligations, review and enforcement of the Code of Ethics.

FLA has voluntarily subscribed to the "Real Fiduciary™ Practices" published by the Institute for the Fiduciary Standard. Real Fiduciary™ Practices offer a simple code of conduct and outline a commitment to clients of subscribing financial advisors. They seek to clearly articulate what a client can expect to receive from a

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subscribing financial advisor. These Real Fiduciary™ Practices do not replace our regulatory compliance obligations or duties to clients under relevant laws, rules, or regulations. The Institute for the Fiduciary Standard's role is limited to publishing the practices as well as maintaining a corresponding register of subscribing financial advisors. You can verify our affirmation of Real Fiduciary™ Practices on our website or at the Institute for the Fiduciary Standard website at www.thefiduciaryinstitute.org. The practices can be found at <https://thefiduciaryinstitute.org/wp-content/uploads/2019/03/Real-Fiduciary-Practices-2019-02-22.pdf>

- B.** We do not recommend to clients, or buy or sell for client accounts, securities in which FLA or a related person has a material financial interest.
- C./D.** Clients understand that FLA and our employees may themselves own securities of the kind recommended for Client account(s). Similarly, FLA, or an associated person, may buy and sell some of the same securities for our own accounts that we buy and sell for our Clients.

This may present a conflict of interest. Thus, it is our policy that our employees may trade in their accounts simultaneously with clients in the same security as part of FLA's trading strategy or account rebalancing (See Item 12 B – below), or after trades are placed for clients.

However, when placing a trade outside of these parameters, employees are asked to consider the following:

- Whether the amount or nature of the transaction will affect the price or market for the security;
- Whether the employee will benefit from purchases or sales being made for any client;
- Whether the transaction is likely to harm any client; and
- Whether there is an appearance or suggestion of impropriety.

FLA reserves the right to disapprove any proposed transaction that may have the appearance of improper conduct.

Our Code of Ethics and Personal Trading Policy does provide a list of exempt transactions for which pre-authorization is not required because the potential conflict with our clients is negligible.

Additionally, our employees are required to submit reports of their personal trading activity quarterly and annual reports of their holdings to our Compliance Department.

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Item 12- Brokerage Practices

A. 1. We recommend Clients open brokerage accounts with Charles Schwab & Co., Inc. ("Schwab"). Schwab offers independent investment Advisors, services which include custody of securities, trade execution, clearance, and settlement of transactions. Our firm is independently owned and operated, and not affiliated with Schwab. FLA receives benefits from Schwab through its participation in the programs. (Please see the disclosure under Item 14 below.) In recommending these broker-dealers, we seek to obtain "best execution," meaning that we seek to execute securities transactions for Clients so that the total costs or proceeds in each transaction are the most favorable under the circumstances. The factors we consider when evaluating for best execution include:

- Capability to execute, clear, and settle trades;
- Competitiveness of the price of services;
- Financial responsibility, security, and stability;
- Responsiveness and quality of service;
- Capability to facilitate transfers and payments to and from accounts;
- Broker-dealer capabilities and reputation;
- The value of any research services/brokerage services provided;
- Breadth of available investment products (stocks, bonds, mutual funds, ETFs, etc.);
- Availability of other products and services that benefit clients; and
- Any other relevant factors.

Certain broker-dealers may provide us with the following products/services: products that allow us to communicate electronically with the broker-dealers, making it easier for us to download account information, place and allocate trades, and submit advisory fees for withdrawal. FLA may periodically use research information provided by our custodian. However, FLA does not have any formal or informal agreements to compensate custodians for the receipt of such products or research. FLA, as a matter of policy and practice, does not engage in soft dollar arrangements whereby it compensates its broker-dealers for products or research with the use of client commissions.

2. FLA does not receive client referrals from our broker-dealers. Thus, Client referrals are not among the selection criteria in choosing a broker-dealer for our Clients.

3. We do allow our Clients to direct brokerage if the requests are made in writing and the institution has the ability to provide FLA the mechanism to enter trades. When a Client selects a broker-dealer other than the primary relationship(s) of FLA, we may be unable to seek best execution for the transactions, and the

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commission costs may be different from those of our recommended broker-dealer. In addition, we may place the transactions after we place transactions for Clients using our recommended broker-dealer. We may need to charge higher fees to meet such accommodation requests and performance reporting for such accounts will be more limited.

B. FLA strives to treat all clients in a fair manner, which is the underlying principal of our trade aggregation and allocation policy. When placing a trade for the same security and conditions for multiple Client accounts, FLA may consider bunching the trades in a single order (an “aggregated” or “block” trade) and consider whether doing so would result in an advantageous execution. When placing an aggregated trade, the following conditions and requirements apply:

- The allocation of the aggregate trade must be determined before the trade is placed with the broker. A record of the proposed allocation shall be prepared prior to placement of the aggregated order and maintained as part of the office’s books and records.
- If a block order is filled (full or partial fill) at several prices through multiple trades, the average price and commission will be used for all trades executed. All participants receiving securities from the block trade must receive the average price. Only trades executed within the block on a single day may be combined for purposes of calculating the average price.
- If the block order is not filled by day-end, FLA will allocate shares executed to the accounts on a pro-rata basis, adjusted as necessary to keep Client transaction costs to a minimum and in accordance with specific account guidelines. However, if the application of this pro-rata allocation policy results in unfair or inequitable treatment to one or more of the Clients, the Chief Compliance Officer will be consulted to determine an acceptable alternative allocation methodology. A record of the actual, revised allocation shall be prepared and maintained together with the proposed allocation as part of the office’s books and records.
- Trades shall not be allocated for the purpose of benefiting FLA or its employees. Allocations may not be made to the accounts of FLA employees, business associates, friends or relatives while excluding advisory Clients from the allocation of any securities.

Item 13- Review of Accounts

A. Performance of the securities purchased for Clients will be continually reviewed and evaluated by FLA to determine whether the security position should be

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liquidated (even if below the original purchase price), increased (even at prices higher than originally acquired), or maintained. Review of individual investment accounts is conducted by the individual financial advisor assigned to those accounts and supervised by the Chief Compliance Officer, or an assigned person designated by the CCO. Reviews can occur as often as quarterly, or in some instances, may occur more often. The level and frequency of reviews is determined by Client need and our discretion. The review focuses on accuracy, completeness, and suitability. Along with looking over the Client's account, we are happy to assist the Client in interpreting and/or compiling custodial statements and FLA reports and transferring relevant information onto the appropriate place on the Client's financial reports as part of the review process.

Reviews of financial plans or financial recommendations occur on an as-needed basis.

- B.** Account reviews may be triggered by a change in a Client's investment objectives; tax considerations; large deposits or withdrawals; large sales or purchases; change in corporate management; or changes in macro-economic climate. Reviews can also occur as a result of information garnered from Advisor's receipt of confirmations, customer statements, and/or Client statements or performance reports from third party managers or other financial institutions.

- C.** Clients receive periodic statements, confirmations and performance reports from various financial service institutions and firms with which the Client transacts business. These firms may include, but are not limited to, brokerages, investment companies, trust companies, other registered investment advisors, banks and credit unions. Clients understand that primary trade confirmation, account statements, annual reports, and prospectuses will be mailed directly from the broker-dealer/custodian of the account.

The frequency of the statements and reports is determined by the financial institution or firm generating the reports. The usual frequency is monthly, quarterly, or annually, or in the instance of confirmation reports, as transactions occur unless Client has requested a quarterly confirm report from a broker-dealer/custodian offering such a service.

Item 14- Client Referrals and Other Compensation

We have no arrangements, written or oral, which compensates any individual or entity for the referral of Clients.

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As disclosed under Item 12 above, FLA participates in the Charles Schwab & Co., Inc. ("Schwab") institutional customer programs and FLA may recommend Schwab to Clients for custody and brokerage services. There is no direct link between FLA's participation in the program and the investment advice it gives to its Clients, although FLA receives economic benefits through its participation in the programs that are typically not available to Schwab retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money manager; and compliance, marketing, research, technology, and practice management products or services provided to Advisors by Schwab and of third party vendors without cost or at a discount.

Schwab may also have paid for business consulting and professional services received by FLA's related persons. Some of the products and services made available by Schwab through the program may benefit FLA but may not benefit its Client accounts. These products or services may assist FLA in managing and administering Client accounts, including accounts not maintained at Schwab. Other services made available by Schwab are intended to help FLA manage and further develop its business enterprise. The benefits received by FLA or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to Schwab. Clients should be aware, however, that the receipt of economic benefits by FLA or its related persons in and of itself creates a potential conflict of interest and may indirectly influence FLA's choice of Schwab for custody and brokerage services.

Item 15- Custody

FLA may be deemed to have custody of some of its clients' assets since the firm has the capability to directly collect advisory fees from some accounts. This service is offered as a convenience with prior written consent from the client and is optional.

The firm is exempt from any surprise annual audits as it meets SEC criteria.

Other than having the ability to deduct our fees directly from Client accounts, we do not have further custody of the assets in Client account(s). Client accounts are maintained with an independent qualified custodian Charles Schwab & Co., Inc.. Our custodians directly provide Clients with account statements, at least, quarterly. When FLA provides

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additional reporting, we ask that they compare the reports from FLA to the statements received from their custodian.

The SEC issued a no-action letter ("Letter") with respect to the Rule 206(4)-2 ("Custody Rule") under the Investment Advisers Act of 1940 ("Advisers Act"). The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client funds to a third party under a standing letter of authorization ("SLOA") is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with our custodians:

- The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client's qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16- Investment Discretion

Except as otherwise instructed, our Clients grant us ongoing and continuous discretionary authority via our investment advisory agreements and custodial documents to execute our investment recommendations in accordance with each Client's objectives and suitability requirements, without the Client's prior approval of each transaction. Under this discretionary authority, Clients allow us to purchase and sell securities and instruments in their account(s), determine the amount of securities to be bought or sold, arrange for delivery and payment in connection with the foregoing, select and retain sub-advisors, and act on their behalf in most matters necessary or

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incidental to the handling of their account, including monitoring certain assets. All transactions in client accounts are made in accordance with the directions and preferences provided to us by our Clients. Clients execute written instructions regarding our trading authority as required by each broker-dealer.

Item 17- Voting Client Securities

FLA does not vote Client proxies and has instructed the custodian to forward all proxy materials directly to each Client. In the event, we do receive a proxy, we forward such materials to the Client or to the Trustees or applicable Advisor (such as for an employee benefit plan covered by ERISA), unless the plan's trust agreement provides otherwise.

Item 18- Financial Information

- A.** FLA does not require prepayment of fees of more than \$1,200 per Client six months or more in advance, therefore disclosures required in this section do not apply to our firm.
- B.** FLA has no financial commitment that impairs or impedes our ability to meet our contractual and fiduciary commitments to clients.
- C.** No one associated with FLA has ever been the subject of a bankruptcy petition.

Item 19- Requirements for State-Registered Advisers

Not applicable.



2338 N. Loop 1604 W., Suite 311
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Kirk W. Francis, CFP®

September 1, 2025

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Additional information about Kirk W. Francis is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Kirk W. Francis is 840623.

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KIRK W. FRANCIS, CFP®

Year of Birth: 1952

Item 2 – Educational Background and Business Experience

EDUCATION

Texas A&M University; College Station, Texas

BUSINESS BACKGROUND

03/2017 to Present:	CEO, CCO, Principal and Investment Advisor Representative Financial Life Advisors, San Antonio, TX
03/1993 to 02/2019:	CEO, CCO, Owner and Investment Advisor Representative Cross Financial Services Corporation, San Antonio, TX
04/2008 to 12/2016:	Registered Principal United Planners' Financial Services, Scottsdale, AZ
03/1993 to 04/2008:	Registered Principal WFG Investments, Inc., Dallas, TX
11/1987 to 03/1993:	Branch Manager and Registered Representative PaineWebber Inc., Weehawken, NJ
09/1981 to 11/1987:	Branch Manager and Registered Representative Dean Witter Reynolds, New York, NY
01/1979 to 09/1981:	Registered Representative E.F. Hutton & Company, New York, NY
07/1977 to 12/1978:	Registered Representative A.G. Edwards & Sons, St. Louis, MO
09/1974 to 7/1977:	Agent Provident Mutual Life Insurance Company, Wilmington, DE

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Industry Examinations and Professional Designations:

Kirk W. Francis has previously taken and passed the following industry examinations: Series 4 (Registered Options Principal), Series 3 (National Commodity Futures), Series 5 (Interest Rate Options), Series 7 (General Securities Representative), Series 8 (General Securities Sales Supervisor), and Series 63 (Uniform Securities Agent State Law). In addition, he previously held a Texas Insurance License. He has also obtained the following designations: Certified Financial Planner (CFP®). The minimum qualifications required for these designations are provided below to assist you in understanding the value of the designation.

CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with a flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (CFP Board). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients.

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

- Education – (1) Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined are necessary for the competent and professional delivery of financial planning services or as a CPA take the Accelerated Path to CFP® certification by completing a Capstone course through a CFP Board Registered Program, and (2) attain a bachelor’s degree from an accredited college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include, retirement planning, investment planning, income tax planning, insurance planning and risk management, estate planning, and psychology of financial planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least 6,000 hours of financial planning-related experience (or 4,000 hours of apprenticeship experience that meets additional requirements); and
- Ethics – Commit to the CFP Board to act as a fiduciary and commit to other high ethical and conduct standards as well as pass a detailed background check.

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification. CFP® Board of Standards: <http://www.cfp.net/>

Item 3 – Disciplinary Information

Kirk W. Francis has not been subject to any legal or disciplinary proceedings which would be considered material (or otherwise) to a Client's evaluation of him or any of the services Financial Life Advisors provides.

Item 4 – Other Business Activities

Mr. Francis is not involved in Other Business Activities.

Item 5 – Additional Compensation

Mr. Francis does not receive any economic benefit from any person, company, or organization, other than Financial Life Advisors, in exchange for providing clients with advisory services through Financial Life Advisors.

Item 6 – Supervision

Mr. Francis is supervised by the firm's Chief Compliance Officer, Nate Morris, who can be reached at (210) 918-8998.

Item 7 – Requirements for State Registered Advisers

Not applicable.



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Benjamin D. Gurwitz, CFP®

September 1, 2025

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Additional information about Benjamin D. Gurwitz is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Mr. Gurwitz is 4702402.

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Benjamin D. Gurwitz, CFP®

Year of Birth: 1980

Item 2 – Educational Background and Business Experience

EDUCATION

Trinity University; San Antonio, Texas

BUSINESS BACKGROUND

01/2017 to Present: COO, Member and Investment Advisor Representative
Financial Life Advisors, San Antonio, TX

09/2008 to 12/2016: Financial Planner and CCO
Financial Life Advisors, San Antonio, TX

Industry Examinations and Professional Designations:

Benjamin D. Gurwitz has previously taken and passed the following industry examinations: Series 63 (Uniform Securities Agent State Law). In addition, he holds a Texas Insurance License. He has also attained and maintains the Certified Financial Planner (CFP®) designation.

CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with a flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (CFP Board). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients.

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

- Education – (1) Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined are necessary for the competent and professional delivery of financial planning services or as a CPA take the Accelerated Path to CFP® certification by completing a Capstone course through a CFP Board Registered Program, and (2) attain a bachelor’s degree from an accredited college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject

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areas include, retirement planning, investment planning, income tax planning, insurance planning and risk management, estate planning, and psychology of financial planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least 6,000 hours of financial planning-related experience (or 4,000 hours of apprenticeship experience that meets additional requirements); and
- Ethics – Commit to the CFP Board to act as a fiduciary and commit to other high ethical and conduct standards as well as pass a detailed background check.

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification. CFP® Board of Standards: <http://www.cfp.net/>

Item 3 – Disciplinary Information

Benjamin D. Gurwitz has not been subject to any legal or disciplinary proceedings which would be considered material (or otherwise) to a Client's evaluation of him or any of the services Financial Life Advisors provides.

Item 4 – Other Business Activities

Mr. Gurwitz is not involved in any Other Business Activities.

Item 5 – Additional Compensation

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Mr. Gurwitz does not receive any economic benefit from any person, company, or organization, other than Financial Life Advisors, in exchange for providing clients with advisory services through Financial Life Advisors.

Item 6 – Supervision

Mr. Gurwitz is supervised by the firm's Chief Compliance Officer, Nate Morris, who can be reached at (210) 918-8998.

Item 7 – Requirements for State Registered Advisers

Not applicable.



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Kimberly A. Nourie, CPA, CFP®

September 1, 2025

This Brochure Supplement provides information about Kimberly A. Nourie that supplements the Financial Life Advisors Firm Brochure (Form ADV Part 2A). You should have received a copy of that Brochure. Please contact our Compliance department at (210) 918-8998 or compliance@fladvisors.com if you did not receive a copy of Financial Life Advisors' Form ADV Part 2A or if you have any questions about the contents of this Brochure Supplement.

Additional information about Kimberly A. Nourie is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Kimberly A. Nourie is 3233900.

FORM ADV PART 2B

Kimberly A. Nourie, CPA, CFP®

Year of Birth: 1962

Item 2 – Educational Background and Business Experience

EDUCATION

08/1980-08/1983: Baylor University, Waco, TX. Bachelor of Business Administration with major in accounting.

BUSINESS BACKGROUND

11/2017 to Present:	Senior Wealth Manager and Investment Advisor Financial Life Advisors, San Antonio, TX
06/2012 to 11/2017:	Financial Consultant Business Financial Group
06/2012 to 11/2017:	Registered Representative and Investment Advisor Commonwealth Financial Network, Waltham, MA
05/1999 to 06/2012:	Senior Vice President, Cross Financial Services Corporation, San Antonio, TX
07/2008 to 06/2012:	Investment Advisor Representative, Cross Financial Services, San Antonio, TX
05/1999 to 06/2012:	Registered Representative of United Planners' Financial Services, Scottsdale, AZ
05/1999 to 07/2008:	Investment Advisor Representative of United Planners' Financial Services, Scottsdale, AZ
05/1995 to 04/1999:	CB Richard Ellis (formerly CB Commercial) VP and Director of Financial Reporting, Torrance, CA Direction of Operations, Los Angeles, CA Regional Administrative Manager, Chicago, IL
12/1986 to 04/1995	American Airlines, DFW, TX Senior Analyst – Corporate Accounting and Reporting Senior Analyst – Health Benefits Analysis Passenger Services Manager – O'Hare Airport Internal Auditor

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Industry Examinations and Professional Designations:

Kimberly A. Nourie has previously taken and passed the following industry examinations: Series 7 (General Securities Representative), Series 24 (General Securities Principal), and Series 63 (Uniform Securities Agent State Law). In addition, she holds a Texas Insurance License. She has also obtained the following designations: Certified Public Accountant and Certified Financial Planner practitioner (CFP®). The minimum qualifications required for these designations are provided below to assist you in understanding the value of the designation.

CERTIFIED PUBLIC ACCOUNTANT (CPA) is the statutory title of qualified accountants in the United States who have passed the Uniform Certified Public Accountant Examination and have met additional state education and experience requirements for certification as a CPA. 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. The mission of the Texas State Board of Public Accountancy is to protect the public by ensuring that persons issued certificates as certified public accountants possess the necessary education, skills, and capabilities and that they perform competently in the profession of public accountancy.

To attain the title of CPA in Texas, an individual must satisfactorily fulfill the following requirements:

- Eligibility for the exam: The following requirements must be met to become eligible to apply for the CPA Exam:
 - Pass a background investigation.
 - Hold a baccalaureate or higher degree from a board-recognized United States college or university, or an equivalent degree from an institution of higher education in another country.
 - Complete 150 semester hours or quarter-hour equivalents of college credit or complete a master's degree or higher degree.
 - Complete 30 semester hours or quarter-hour equivalents of upper-level accounting courses.
 - Complete 24 semester hours or quarter-hour equivalents of upper-level related business courses.
 - Complete a 3-semester-hour ethics course that had prior Board approval.
 - Pass an exam on the Board's Rules of Professional Conduct.
- Experience - One year of experience is required and shall consist of full- or part-time employment that extends over a period of not less than one year and not more than two years and includes not fewer than 2000 hours of performance of services described in Board Rule 511.122. Work experience must be reported in years and months and is in addition to passing the CPA Exam.
- Ethics - Every licensee must complete a 4-hour ethics course approved by the Board pursuant to Board Rule 523.131. In addition, licensees must complete this

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4-hour ethics course on a 2-year cycle (i.e., every other year).

- Continuing Education - Complete 120 hours of continuing education hours every three years, with an annual minimum of 20 hours.

The Public Accountancy Act ("Act"), Chapter 901 of the Occupations Code, authorizes the Texas State Board of Public Accountancy ("Board") to investigate and prosecute allegations of professional misconduct against Certified Public Accountants ("CPAs") from any source, including the public and other CPAs.

CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with a flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (CFP Board). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients.

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

- Education – (1) Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined are necessary for the competent and professional delivery of financial planning services or as a CPA take the Accelerated Path to CFP® certification by completing a Capstone course through a CFP Board Registered Program, and (2) attain a bachelor's degree from an accredited college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include, retirement planning, investment planning, income tax planning, insurance planning and risk management, estate planning, and psychology of financial planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least 6,000 hours of financial planning-related experience (or 4,000 hours of apprenticeship experience that meets additional requirements); and
- Ethics – Commit to the CFP Board to act as a fiduciary and commit to other high ethical and conduct standards as well as pass a detailed background check.

FORM ADV PART 2B

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification. CFP® Board of Standards: <http://www.cfp.net/>

Item 3 – Disciplinary Information

Kimberly A. Nourie has not been subject to any legal or disciplinary proceedings which would be considered material (or otherwise) to a Client's evaluation of her or any of the services Financial Life Advisors provides.

Item 4 – Other Business Activities

Ms. Nourie is not involved in Other Business Activities.

Item 5 – Additional Compensation

Ms. Nourie does not receive any economic benefit from any person, company, or organization, other than Financial Life Advisors, in exchange for providing clients with advisory services through Financial Life Advisors.

Item 6 – Supervision

Ms. Nourie is supervised by the firm's Chief Compliance Officer, Nate Morris, who can be reached at (210) 918-8998.

Item 7 – Requirements for State Registered Advisers

Not applicable.



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Joshua J. Hussong, CFP®

September 1, 2025

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Additional information about Joshua J. Hussong is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Mr. Hussong is 5797604.

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Joshua J. Hussong, CFP®

Year of Birth: 1985

Item 2 – Educational Background and Business Experience

EDUCATION

University of the Incarnate Word; San Antonio, Texas

BUSINESS BACKGROUND

03/2024 to Present:	Associate Financial Planner Financial Life Advisors, San Antonio, TX
07/2013 to 02/2024:	VP-Financial Consultant Charles Schwab & Co., Inc., San Antonio, TX
05/2012 to 07/2013:	Financial Advisor Citigroup Global Markets Inc., San Antonio, TX
06/2010 to 01/2012:	Financial Services Professional NYLife Securities LLC, San Antonio, TX

Industry Examinations and Professional Designations:

Joshua J. Hussong has previously taken and passed the following industry examinations: Series 65 (Uniform Investment Advisor Law Examination). In addition, he holds a Texas Insurance License. He has also attained and maintains the Certified Financial Planner (CFP®) designation.

CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with a flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (CFP Board). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients.

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

- Education – (1) Complete an advanced college-level course of study addressing

FORM ADV PART 2B

the financial planning subject areas that CFP Board's studies have determined are necessary for the competent and professional delivery of financial planning services or as a CPA take the Accelerated Path to CFP® certification by completing a Capstone course through a CFP Board Registered Program, and (2) attain a bachelor's degree from an accredited college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include, retirement planning, investment planning, income tax planning, insurance planning and risk management, estate planning, and psychology of financial planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least 6,000 hours of financial planning-related experience (or 4,000 hours of apprenticeship experience that meets additional requirements); and
- Ethics – Commit to the CFP Board to act as a fiduciary and commit to other high ethical and conduct standards as well as pass a detailed background check.

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification. CFP® Board of Standards: <http://www.cfp.net/>

Item 3 – Disciplinary Information

Joshua J. Hussong has not been subject to any legal or disciplinary proceedings which would be considered material (or otherwise) to a Client's evaluation of him or any of the services Financial Life Advisors provides.

FORM ADV PART 2B

Item 4 – Other Business Activities

Mr. Hussong is not involved in any Other Business Activities.

Item 5 – Additional Compensation

Mr. Hussong does not receive any economic benefit from any person, company, or organization, other than Financial Life Advisors, in exchange for providing clients with advisory services through Financial Life Advisors.

Item 6 – Supervision

Mr. Hussong is supervised by the firm's Chief Compliance Officer, Nate Morris, who can be reached at (210) 918-8998.

Item 7 – Requirements for State Registered Advisers

Not applicable.



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www.fladvisors.com

Scott E. Leavitt, CFP®

September 1, 2025

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Additional information about Scott E. Leavitt is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Mr. Leavitt is 7508961.

FORM ADV PART 2B

Scott E. Leavitt, CFP®

Year of Birth: 1995

Item 2 – Educational Background and Business Experience

EDUCATION

Brigham Young University; Rexburg, Idaho

BUSINESS BACKGROUND

11/2024 to Present:	Associate Financial Planner Financial Life Advisors, San Antonio, TX
02/2022 to 11/2024:	Investment Advisor Representative Arrow Wealth Advisors, San Antonio, TX
05/2021 to 07/2021:	Intern Arrow Wealth Advisors, San Antonio, TX

Industry Examinations and Professional Designations:

Scott E. Leavitt has previously taken and passed the following industry examinations: Series 65 (Uniform Investment Advisor Law Examination). He has also attained and maintains the Certified Financial Planner (CFP®) designation.

CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with a flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (CFP Board). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients.

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

- Education – (1) Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined are necessary for the competent and professional delivery of financial planning services or as a CPA take the Accelerated Path to CFP® certification by completing a Capstone course through a CFP Board Registered Program, and (2) attain a bachelor’s degree from an accredited college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include, retirement planning, investment planning, income tax planning,

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insurance planning and risk management, estate planning, and psychology of financial planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least 6,000 hours of financial planning-related experience (or 4,000 hours of apprenticeship experience that meets additional requirements); and
- Ethics – Commit to the CFP Board to act as a fiduciary and commit to other high ethical and conduct standards as well as pass a detailed background check.

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification. CFP® Board of Standards: <http://www.cfp.net/>

Item 3 – Disciplinary Information

Scott E. Leavitt has not been subject to any legal or disciplinary proceedings which would be considered material (or otherwise) to a Client's evaluation of him or any of the services Financial Life Advisors provides.

Item 4 – Other Business Activities

Mr. Leavitt is not involved in any Other Business Activities.

Item 5 – Additional Compensation

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Mr. Leavitt does not receive any economic benefit from any person, company, or organization, other than Financial Life Advisors, in exchange for providing clients with advisory services through Financial Life Advisors.

Item 6 – Supervision

Mr. Leavitt is supervised by the firm's Chief Compliance Officer, Nate Morris, who can be reached at (210) 918-8998.

Item 7 – Requirements for State Registered Advisers

Not applicable.



2338 N. Loop 1604 W., Suite 311
San Antonio, TX 78248

(210) 918-8998
www.fladvisors.com

Nathaniel A. Morris

September 1, 2025

This Brochure Supplement provides information about Nathaniel A. Morris that supplements the Financial Life Advisors Firm Brochure (Form ADV Part 2A). You should have received a copy of that Brochure. Please contact our Compliance department at (210) 918-8998 or compliance@fladvisors.com if you did not receive a copy of Financial Life Advisors' Form ADV Part 2A or if you have any questions about the contents of this Brochure Supplement.

Additional information about Nathaniel A. Morris is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Nathaniel A. Morris is 4657148.

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Nathaniel A. Morris

Year of Birth: 1976

Item 2 – Educational Background and Business Experience

EDUCATION

CFNI - Dallas, Texas. Associate Degree

BUSINESS BACKGROUND

04/2020 to Present:	Operations & Compliance Financial Life Advisors, San Antonio, TX
10/2012 to 04/2020:	Chief Compliance Officer & Investment Advisor CIS Wealth Management Group, New Braunfels, TX
11/2017 to 08/2019:	OSJ & Registered Representative Cetera Advisor Networks, New Braunfels, TX
07/2012 to 11/2017:	OSJ & Registered Representative Girard Securities, New Braunfels, TX
07/2012 to 03/2013:	Investment Advisor Representative Legacy Wealth Counselors, New Braunfels, TX
08/2005 to 06/2012:	Registered Representative NEXT Financial Group, New Braunfels, TX
05/2002 to 08/2005:	Registered Admin Linsco/Private Ledger Corp, New Braunfels, TX

Industry Examinations and Professional Designations:

Nathaniel A. Morris has previously taken and passed the following industry examinations: Series 7 (General Securities Representative), Series 24 (General Securities Principal), Series 51 (Municipal Securities Limited Principal), Series 63 (Uniform Securities Agent State Law), and Series 66 (Uniform Combined State Law).

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Item 3 – Disciplinary Information

Nathaniel A. Morris has not been subject to any legal or disciplinary proceedings which would be considered material (or otherwise) to a Client's evaluation of him or any of the services Financial Life Advisors provides.

Item 4 – Other Business Activities

Mr. Morris is not involved in Other Business Activities.

Item 5 – Additional Compensation

Mr. Morris does not receive any economic benefit from any person, company, or organization, other than Financial Life Advisors, in exchange for providing clients with advisory services through Financial Life Advisors.

Item 6 – Supervision

As Chief Compliance Officer of Financial Life Advisors, Nate Morris supervises all duties and activities of the firm. Mr. Morris' contact information is located on the cover page of this disclosure document. Mr. Morris follows all policies and procedures as outlined in the firm's compliance manual, including the Code of Ethics.

Item 7 – Requirements for State Registered Advisers

Not applicable.



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Mary Jo Haselhorst, CPFA[®], AIF[®]

September 1, 2025

This Brochure Supplement provides information about Mary Jo Haselhorst that supplements the Financial Life Advisors Firm Brochure (Form ADV Part 2A). You should have received a copy of that Brochure. Please contact our Compliance department at (210) 918-8998 or compliance@fladvisors.com if you did not receive a copy of Financial Life Advisors' Form ADV Part 2A or if you have any questions about the contents of this Brochure Supplement.

Additional information about Mary Jo Haselhorst is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Mary Jo Haselhorst is 5393352.

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Mary Jo Haselhorst, CPFA® AIF®

Year of Birth: 1961

Item 2 – Educational Background and Business Experience

EDUCATION

South Dakota School of Mines and Technology; Rapid City, SD. BS Computer Science
1983

BUSINESS BACKGROUND

10/2019 to Present:	Retirement Plan Consultant Financial Life Advisors, San Antonio, TX
07/2007 to 10/2019:	Senior Financial Consultant Commonwealth Financial Network, San Antonio, TX
09/1992 to 07/2007:	President/Owner/Consultant/Manager of Operations Expert Healthcare Solutions, Inc./Muro Health Solutions, San Antonio, TX
07/1983 to 07/1992:	Computer Scientist/Program Manager Naval Air Weapon Station, China Lake, CA

Industry Examinations and Professional Designations:

Mary Jo Haselhorst has previously taken and passed the following industry examinations: Accredited Investment Fiduciary (AIF®) and the Certified Plan Fiduciary Advisor (CPFA®). The minimum qualifications required for these designations are provided below to assist you in understanding the value of the designation.

The Accredited Investment Fiduciary® (AIF®) designation represents a thorough knowledge of and ability to apply the fiduciary Practices. AIF® designees have a reputation in the industry for the ability to implement a prudent process into their own investment practices as well as being able to assist others in implementing proper policies and procedures. (AIF®) Training is the best way for investment fiduciaries to absorb the Prudent Practices, their legal underpinnings and how to apply them within existing fiduciary policies and procedures. Through the AIF program participants, learn to: articulate the basis for, and benefits of, fiduciary standards of excellence; identify when an individual or organization may be deemed to have fiduciary status; identify the legal standards that require fiduciaries to prudently manage investment decisions; apply the practices that define a prudent investment process for Investment Stewards and Advisors and recognize the Practices for and Investment Managers. A proctored final exam is

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required as well as an adherence to the ethical standards and continuing education are required to maintain the designation. <http://www.fi360.com/main/about.jsp>

The Certified Plan Fiduciary Advisor (CPFA®) credential, offered by the National Association of Plan Advisors (NAPA). Plan advisors who earn their CPFA demonstrate the expertise required to act as a plan fiduciary or help plan fiduciaries manage their roles and responsibilities. The NAPA CPFA coursework covers four key areas: (1) ERISA Fiduciary Roles and Responsibilities, (2) ERISA Fiduciary Oversight, (3) ERISA Plan Investment Management, and (4) ERISA Plan Management. To earn the CPFA designation, candidates must pass a proctored CPFA examination. In order to maintain the credential, holders of the CPFA credential must earn 10 continuing education credits every year. Each calendar year a minimum of four (4) hours of the annual ten (10) hour CE requirement must cover retirement plan (“Relevant Topics”) identified in the continuing education policy statement. In addition, a minimum of one (1) hour of CE credit earned annually must address professional ethics and the ARA’s Code of Professional Conduct (“Ethics”). The remaining five hours may be on any topic relevant to a NAPA member’s professional development (“Professional Development”) in the retirement field. For more information, visit: <https://napacpfa.org/#about-cpfa>.

Item 3 – Disciplinary Information

Mary Jo Haselhorst has not been subject to any legal or disciplinary proceedings which would be considered material (or otherwise) to a Client’s evaluation of her or any of the services Financial Life Advisors provides.

Item 4 – Other Business Activities

Ms. Haselhorst is not involved in Other Business Activities.

Item 5 – Additional Compensation

Ms. Haselhorst does not receive any economic benefit from any person, company, or organization, other than Financial Life Advisors, in exchange for providing clients with advisory services through Financial Life Advisors.

Item 6 – Supervision

Ms. Haselhorst is supervised by the firm’s Chief Compliance Officer, Nate Morris, who can be reached at (210) 918-8998.

Item 7 – Requirements for State Registered Advisers

Not applicable.

Privacy Policy Notice

Rev. February 12, 2025

Rev. February 12, 2020

FACTS		WHAT DOES FINANCIAL LIFE ADVISORS, LLC DO WITH YOUR FINANCIAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.		
What?	The types of personal information we collect and share depends on the product or service you have with us. This information can include: <ul style="list-style-type: none">▪ Social Security number and income▪ Account balances and assets▪ Transaction history		
How?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons Financial Life Advisors, LLC chooses to share; and whether you can limit this sharing.		
Reasons we can share your personal information		Does Financial Life Advisors, LLC share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus		Yes	No
For our marketing purposes – to offer our products and services to you		Yes	No
For joint marketing with other financial companies		No	Not Applicable
For our affiliates’ everyday business purposes – information about your transactions and experiences		No	Not Applicable
For our affiliates’ everyday business purposes – information about your creditworthiness		No	Not Applicable
For our affiliates to market to you		No	Not Applicable
For nonaffiliates to market to you		No	Not Applicable
Questions?	Call (210) 918-8998		

Who we are	
Who is providing this notice?	Financial Life Advisors, LLC
What we do	
How does Financial Life Advisors, LLC protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and building.
How does Financial Life Advisors, LLC collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> ▪ Open an account ▪ Deposit money ▪ Seek advice about your investments ▪ Enter into an investment advisory contract ▪ Tell us about your investment or retirement portfolio or earnings <p>We also collect your personal information from other companies.</p>
Definitions	
Affiliates	<p>Companies related by common ownership and control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>We do not share with our affiliates.</i>
Nonaffiliates	<p>Companies not related by common ownership and control. They can be financial or nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>We do not share with nonaffiliates so that they can market to you.</i>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or service to you.</p> <ul style="list-style-type: none"> ▪ <i>We do not jointly market.</i>