Jordan Financial Strategies Financial Advisory Services

Jordan Financial Strategies, LLC A Registered Investment Advisor

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This brochure contains information from Part 2A-Jordan Financial Strategies, LLC and Part 2B-Kristy R. Jordan of Form ADV as required by the Securities and Exchange Commission (SEC) pursuant to the Investment Advisors Act of 1940 and the State of Colorado. Information contained in this brochure regarding the qualifications and business practices of Jordan Financial Strategies, LLC and our advisory services has not been approved or verified by the SEC or any federal or state government agency. Registration of an Investment Advisor does not imply any level of skill or training.

If you have any questions about the contents of this brochure, please use the contact information above. Additional information about Jordan Financial Strategies, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Updated June 30, 2011.

Item 2 - Material Changes - Release date June 30, 2011

The brochure has been updated to include specific formatting required by the State of Colorado. Specifically, the last page shows the inclusion of Part 2B-Kristy R. Jordan (the Brochure Supplement) and is combined with Part 2A in this brochure.

Item 2 - Material Changes - Release date March 11, 2011

On July 28, 2010, the Securities and Exchange Commission adopted amendments to Part 2 of Form ADV and related rules that require investment advisers registered under the Investment Advisers Act of 1940 to provide clients with a Brochure written in plain English.

While Jordan Financial Strategies, LLC has always provided the Brochure in plain English format, the new regulations also require a specific format for the Brochure. This new Brochure contains new information that our previous brochure did not require.

In the future, Item 2 – Material Changes, will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. In alignment with the new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of the calendar year. We may provide other ongoing disclosure information about material changes as necessary.

We will provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. This Brochure was last updated on January 31, 2011 and the prior Brochure was updated January 14, 2010.

Currently, our Brochure may be requested by contacting Kristy R. Jordan, Chief Compliance Officer, at 303-444-1110 or kj@krjordan.com. Additional information about Jordan Financial Strategies, LLC 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 Jordan Financial Strategies LLC, who are registered, or are required to be registered, as investment adviser representatives of Jordan Financial Strategies, LLC.

Jordan Financial Strategies, LLC (JFS) suggests a thorough reading of the Brochure although there are no material changes to the nature of how JFS conducts business.

Item 3 - Table of Contents

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Item 4 – Advisory Business

Jordan Financial Strategies, LLC was established as a Registered Investment Advisor in March 1998.

Kristy R. Jordan is the Managing Member and Chief Compliance Officer of Jordan Financial Strategies, LLC. Kristy R. Jordan is currently a Registered Representative and Registered Principal with Geneos Wealth Management Inc (Geneos).

Ms. Jordan provided investment advice and financial planning services as a Registered Representative and Investment Advisor Representative on behalf of American Express Financial Advisors (January 1989 through March 1998), on behalf of Linsco/Private Ledger (March 1998 through January 2000), on behalf of Sagemark Consulting (January 2000 to December 2002), and carries a current affiliation with Geneos (January 2003 to present). In addition to these functions, Ms. Jordan served as a District Manager for American Express Financial Advisors. In this capacity, she supervised the hiring, training and development of new advisors and provided technical expertise and support to veteran advisors.

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Kristy R. Jordan on behalf of Jordan Financial Strategies, LLC (JFS) or the integrity of the management of JFS. In addition, JFS is required to disclose if Kristy R. Jordan has been involved in being found liable in an arbitration claim, in a civil suit, in an administrative proceeding, or bankruptcy. JFS has no information applicable to this Item.

Kristy R. Jordan

Born: 1958

Education: Graduated, University of Northern Colorado, 1981
Philosophy, Accounting
Graduated, University of Northern Colorado, 1988
Master of Business Administration

Jordan Financial Strategies, LLC does not maintain specific educational requirements for those providing advice; however, Ms. Jordan is a CERTIFIED FINANCIAL PLANNER (CFP®), a Chartered Financial Consultant, a Chartered Life Underwriter and carries the following licenses: NASD Series 24 (Registered Principal), NASD Series 7 (General Securities Registered Representative), NASD Series 63, NASD Series 66, Colorado Life, Accident & Health and Colorado Variable Contracts.

The CERTIFIED FINANCIAL PLANNER $^{\text{TM}}$, CFP $^{\text{@}}$ and federally registered CFP (with flame design) marks (collectively, the "CFP $^{\text{@}}$ 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. Currently, more than 62,000 individuals have obtained CFP[®] certification in the United States.

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

- Education Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP[®] professionals.

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

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

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Financial advisory services provided by Jordan Financial Strategies, LLC (JFS) may include the analysis of your situation and assistance in identifying and implementing appropriate financial planning and investment management techniques to help you meet your specific financial objectives. Such services may include a written financial analysis and specific or general investment and/or financial planning recommendations.

In delivering analysis and advice, JFS engages in two main services detailed below: **Financial Planning** and **Investment Advisory Services**.

Financial Planning

Your financial plan may address any or all of the six areas of financial planning established by the National Endowment for Financial Education and endorsed by the Certified Financial Planner Board of Standards. The recognized areas of financial planning include: financial position, protection planning, investment planning, income tax planning, retirement planning and estate planning.

Specific services may include:

- Assessment of your overall financial position including net worth, cash flow and debt;
- Calculation of your pre-retirement savings and investing needs;
- Determination of appropriate income planning strategies for both pre-and post-retirement timeframes:
- Estimates of your federal estate taxes and a suggested plan of action to help meet estate planning objectives;
- Review and determination of your life, long-term care or disability insurance needs;
- Suggestions for minimizing your federal and state income taxes;
- Review of existing and proposed investment asset mixes to help you meet your overall financial objectives. This would include a review of risk/return issues and a suggested plan of action consistent with your risk tolerance and overall financial objectives.
- Development of effective strategies related to business ownership succession and transition planning.
- Presentation of public or private educational seminars related to any or all of the topics outlined in the preceding items.

Service Agreement

The Jordan Financial Strategies Financial Advisory Service Agreement will remain in effect until the earlier of: termination by you as described in the Client Service Guarantee and Refund Policy section of this brochure; termination by Jordan Financial Strategies, LLC as specified below; or, being superceded by a subsequent Financial Advisory Service Agreement.

Jordan Financial Strategies, LLC may terminate the agreement by sending written notice of termination 30 days in advance of the termination date to your address as shown on our

records. By signing the service agreement and making payment, you receive the services you and your financial advisor have agreed upon. If you have a written financial analysis performed, the terms of the agreement will be fulfilled when you receive your financial analysis and it is explained to you.

Sources of Information

In preparing your financial analysis and recommendations, the primary source of information is the information provided by you. This information may include investment statements, tax returns, existing insurance policies, wills, estate planning documents and your goals and objectives. Each financial plan is specific to the client's unique financial situation.

Additionally, your financial advisor may rely on information such as prospectuses, annual reports, filings with the Securities and Exchange Commission, corporate rating services, industry publications, company press releases, and research material provided by various sources.

Investment Advisory Services

The type of investment advisory services provided by Jordan Financial Strategies, LLC will vary based on your situation and objectives. Such advice will generally include written or verbal recommendations on investments, retirement planning needs, and insurance products. Generally, the specific products recommended will be limited to products available through Jordan Financial Strategies, LLC (a Registered Investment Advisor) and custodied through TD Ameritrade. Other custody arrangements may be initiated in the future.

Jordan Financial Strategies, LLC does not take custody of your assets or funds. For your convenience in implementing investment advisory services, Jordan Financial Strategies, LLC (as a Registered Investment Advisor) maintains relationships with TD Ameritrade and other account holding entities, to provide account services and duplicate statements to Jordan Financial Strategies, LLC and its clients. If you wish to use these services, the companies require you to execute a Limited Power of Attorney (LPOA) giving Jordan Financial Strategies, LLC the authority to instruct the custodian as to trades to be effected in the account. As of December 31, 2010 Jordan Financial Strategies, LLC manages \$45,500,000 on a Discretionary basis and \$13,100,000 on a Non-Discretionary basis. In addition, Jordan Financial Strategies, LLC is permitted, but is not required, to advise clients on accounts held apart from Jordan Financial Strategies, LLC.

Investment Advisory Sources of Information

In preparing your investment analysis, recommendations, and placement, the primary source of information is the information provided by you. This information may include investment statements, tax returns, existing insurance policies, wills, estate planning documents and your goals and objectives. Additionally, your financial advisor may rely on information such as prospectuses, annual reports, filings with the Securities and Exchange Commission, corporate rating services, industry publications, company press releases, and research material provided by various sources. JFS does not implement a "model" approach to investment design. Each client is assumed to have slightly different information, yielding different design considerations.

Item 5 – Fees and Compensation

Fees – Financial Planning

Your fee for the designated financial planning services can be determined in the following ways:

Fixed Fee: Under a fixed fee arrangement, any fee will be agreed upon by you and your financial advisor in advance of services being performed. The fee will be determined based on a variety of factors including your net worth, the complexity of your financial situation, agreed upon deliverables, and whether or not you intend to implement any recommendations through your financial advisor.

The type of fee and, in the case of a fixed fee, the amount of the fee must be agreed to by you and your financial advisor prior to the signing of the service agreement. The full fixed fee is payable upon signing the agreement unless partial payments are agreed on in advance. Any work for a fee, which is paid in advance, will be completed within six months of the date your fee is paid. If the work is not completed in such a time, your fee will be refunded to you.

• Hourly Rate: Under an hourly rate agreement, your total cost for financial advisory services will be based on the amount of time spent by your financial advisor and staff of the firm in developing your financial plan. This includes time spent meeting with you, as well as time spent analyzing your financial objectives and evaluating and documenting alternative strategies. Also included is paraplanner and administrative support staff time spent on your case. Our hourly rates are as follows:

Investment Advisor Representative: \$225 per hour

Paraplanner: \$85 per hour

Administrative Support: \$35 per hour

In no case are these negotiated fees for Financial Planning based on or related to the performance of your funds or investments.

Client Service Guarantee And Fee Refund Policy

We are committed to providing all of our clients excellent client service and ensuring their satisfaction. If after receiving the agreed-upon service, for any reason, you are dissatisfied, we will work with you to ensure your satisfaction. If we are unable to meet your expectations, we will refund the financial planning fee in full for a period of up to six months from the date the agreement is signed.

For any financial planning fees payable in advance, you may cancel the agreement within five days and receive a full refund. For fixed fee arrangements beyond the five-day period, if you decide to terminate your agreement before the agreed-upon service is provided, a full refund will also be provided. Under an hourly billing plan, you may cancel the agreement at any time after the five-day period and receive a full refund less the hourly charges already incurred.

Fees – Investment Advisory

If Investment Advisory Services are selected, all fees will be negotiated, detailed and authorized on Schedule C of the Jordan Financial Strategies, LLC Investment Advisory Service Agreement. Account fees are billed quarterly in advance. Account fees may be deducted from clients' investment accounts or billed separately. Aggregated client fees typically fall in a 1% range but can fall between .33% and 3% depending on complexity and account size. If the agreement is terminated, the client, at the principal's discretion, may receive, but is not entitled to, a pro-rated refund. A full description of services is detailed in the Jordan Financial Strategies, LLC Investment Advisory Services Agreement, available upon request.

Jordan Financial Strategies, LLC does not take custody of client assets for investment advisory purposes, and does not require clients to maintain a minimum account balance in order to provide such services through Jordan Financial Strategies, LLC.

Inappropriate expenses can be a real drag on portfolio performance. It is important to understand what you are paying and what you are getting for your money. The costs must be appropriate for the quality of benefits and services you receive. Fees and Expenses fall into four broad categories and you may not experience fees in all categories:

<u>Investment Management Fees</u> - Those fees paid for the day-to-day management of the portfolio by professional money managers. These costs may range from 7 to 250 basis points (0.07% to 2.50%) or more depending on the type of account, the manager and the number of additional services that may be included.

<u>Trading and other Operational Expenses</u> - The costs associated with buying and selling investments. These may include transaction fees, transfer and custodial fees, markups and markdowns. Excluding markups and markdowns these expenses typically range between 1 and 250 basis points (0.01% to 2.50%) per year depending upon the type of account, its turnover, etc.

<u>Administration Expenses</u> - In addition to those fees charged directly for investment management and operations, there may be expenses for other services including independent reporting and monitoring, manager due diligence and account servicing.

Advisory Fees - These fees pay for ongoing advice as detailed in the JFS Investment Advisory Services Agreement. Because the other fees do not pay for services that are specific and unique to you, advisory services are the critical link between you, the investment manager and the day-to-day operation of the portfolio. These fees and the nature of the advisory services are outlined in separate agreements and typically run 33 to 300 basis points (.33% to 3%).

More information on implementation of investment practices may be found in Item 12.

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

Jordan Financial Strategies, LLC does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Jordan Financial Strategies, LLC is a Registered Investment Advisor under the Investment Advisors Act of 1940. We provide advice to individuals, trusts, estates, corporations, and charitable organizations.

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

Your financial advisor compares your financial objectives and risk tolerance to various products and strategies to assess their appropriateness for your situation. Additionally, fundamental security analysis and factors such as asset value, current yield, potential for appreciation, potential for income production, liquidity, historical return and volatility are considered.

Numerous studies have shown that how you allocate your investments among the major asset classes has a great impact on the returns you will earn and risks you will take. In meetings with JFS, you will review and select a basic initial design that feels appropriate. Your specific recommended portfolio design and asset allocation will be described in detail. Typically, JFS will prepare "what if" scenarios developed with third party software such as Morningstar. These scenarios will allow the client to assess a comfort level with a backward look at generic historical returns.

Investment Strategies

Some investment strategies used to implement any investment advice given to clients include, but are not limited to: long term purchases (securities held at least one year), short term purchases (securities sold within a year), trading (securities sold within 30 days), margin transactions, and options (including covered writing, or spreading strategies). Long term strategies are the primary focus.

Types of products on which we provide advice and review include: mutual fund shares, corporate debt securities, exchange-listed securities, securities traded over-the-counter (OTC), variable annuities, variable life insurance, certificates of deposit, U.S. government securities, municipal securities, foreign issues, warrants, commercial paper, securities and commodity options, real estate or timber partnerships and investment trusts, and oil and gas interest partnerships. The primary focus is mutual fund shares, exchange-listed and OTC securities.

Approaches that may be used in developing your recommendations include long-term strategies such as asset allocation, dollar cost averaging and reinvestment of dividends.

Risk of Loss

The following risks exist and every investment portfolio will be subject to a balance between some or all of them:

<u>Inflation Risk</u> – One long-term risk to your financial security is your loss of purchasing power due to inflation. For example, at only 3% annual inflation, in 10 years you lose over 26% of your purchasing power and in 20 years nearly 50%.

<u>Interest Rate Risk</u> - This is the fluctuation in value that occurs when interest rates change. If interest rates go up, the market value of interest sensitive investments will go down; when interest rates go down, income or cash flow may be reduced.

<u>Reinvestment Risk</u> - This is the risk that the principal from a maturing, interest paying investment such as a certificate of deposit, a deferred fixed annuity or an individual bond cannot be reinvested to generate the same level of income as before. This has been a significant risk since the early 1980's as interest rates have generally fallen.

<u>Market Risk</u> - The day-to-day fluctuations in value that always occur in every investment market. In some markets the fluctuations can be very severe, especially over the short term. This is a short-term risk historically, but often one of the most difficult to experience.

<u>Non-Diversification Risk</u> – Historically, non-diversified portfolios have fluctuated more in market value than properly diversified portfolios. Assuming history repeats itself, for any expected level of investment return, a non-diversified portfolio is riskier than a diversified portfolio.

<u>Timing Risk</u> - Although a portfolio may earn its expected rate of return over the long term, there is the risk that the pattern or timing of the returns actually earned will work against you. For an extreme example, a two-year investment result of -100% and +100% has an arithmetic average return of 0%. However, after the first year, there would be nothing left. To minimize Timing Risk a number of different historical patterns of returns should be analyzed to determine the percentage of times a given portfolio is likely to succeed.

<u>Investor Behavior</u> - The past 10 - 15 years of very volatile investment markets have brought another risk into focus - the risk of investor behavior. Many studies have shown that the average investor's investment returns are substantially below the investment returns of the markets in which they have invested. In other words, the investments they have made have done well, but they, as investors, have not. This happens because they attempt to time the markets, act as a short-term investor and fail to stick to a well developed investment plan.

Acceptable Annual Fluctuation in Value - Although proper diversification through using asset allocation techniques can reduce the chance of negative returns, only an ultra-conservative portfolio invested primarily in Safety of Principal investments can guarantee no nominal losses. However, an ultra-conservative portfolio will usually have a negative real return because of inflation. Any portfolio using investments such as bonds or stocks will always have some fluctuation in market value.

<u>Risk/Return Expectations</u> - With JFS, you will clarify your objectives, time constraints and select a pattern of investing that reflects an appropriate measure of risk (based on historical information). Defining comfort with risk is notoriously difficult as investors historically have a great "tolerance" for risk as investments increase in value while decreases in value are very painful. It is your responsibility to reflect on your experience through market cycles and communicate your comfort level to your advisor. It is also your responsibility to communicate a

change in circumstance, timing, or objectives to your advisor. If a change in your comfort level or circumstances indicate a potential change in the nature of the portfolio design, then a change in anticipated future performance will be indicated.

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 Jordan Financial Strategies, LLC (JFS) or the integrity of the management of JFS. JFS has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

The principal of Jordan Financial Strategies, LLC (JFS) is a Registered Representative and is a Principal Sales Office with Geneos Wealth Management Inc (Geneos), a FINRA-registered broker-dealer. As a registered representative, Kristy R. Jordan may offer securities through Geneos and receive normal and customary commissions as a result of such purchases and sales. Ms. Jordan spends approximately 2% of her time on these activities.

In addition, Ms. Jordan is licensed as an insurance agent with various insurance companies. She spends approximately 3% of her time on insurance-related activities.

Ms. Jordan spends approximately 5% of her time on these activities detailed above in addition to her activities on behalf of Jordan Financial Strategies, LLC. On behalf of Jordan Financial Strategies, LLC, approximately 15% of her time is spent on Financial Planning services and 80% of her time is spent on managing Investment Advisory accounts.

Clients in need of brokerage services will have Geneos, in its capacity as a broker-dealer, recommended to them. Clients selecting products available through Geneos must be served by the Registered Representative of this broker-dealer, acting in the capacity of a Registered Representative of Geneos. Investment selection and management on the Geneos platform IS NOT subject to the provisions of the Registered Investment Advisor, Jordan Financial Strategies, LLC. Full disclosure of compliance regulations and suitability requirements for investing in products through Geneos is provided by the Registered Representative. General information on Geneos may be reviewed on their website, www.geneoswealth.com. The primary means of compensation for Registered Representatives of Geneos is on a commission basis. Due to the nature of its business, the Registered Representatives of Geneos do not have discretion to select broker-dealers; therefore, product, research and services of the broker-dealer are not a determinate of the client's fees. To the extent product placement is suggested through Geneos, this commission arrangement may create a potential conflict of interest and creates income to the Registered Representative that exceeds or is apart from any Account Fee agreed on through separate work by Jordan Financial Strategies, LLC.

The Registered Representative will receive a commission from any recommendations that she makes and that you implement through the broker-dealer, Geneos, or through the insurance companies with which she is licensed. To the extent that she receives a commission or fee on any of these activities, this presents a conflict of interest.

However, you have no obligation to implement any of the recommendations made by any employee of Jordan Financial Strategies, LLC or those recommendations contained in your financial plan.

Jordan Financial Strategies, LLC does not charge a fee for any product, analysis or recommendation related to insurance. You determine whether or not to implement any of the recommendations. To the extent product placement is suggested through Kristy R. Jordan as an insurance agent licensed through the Colorado Division of Insurance, any commission arrangement may create a potential conflict of interest and income to the agent that exceeds any Account Fee agreed on through separate work by Jordan Financial Strategies, LLC.

In the event that any employee of Jordan Financial Strategies, LLC or Registered Representative of Geneos may have an interest in or a position in securities recommended to a client, no employee or representative will put their interest ahead of the client's interest. No employee or representative will trade in such a way as to obtain a better price for themselves than for their clients. A complete copy of the Jordan Financial Strategies, LLC Code of Ethics and Personal Trading Policy may be obtained upon request.

Item 11 – Code of Ethics

Jordan Financial Strategies, LLC (JFS) has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at JFS must acknowledge the terms of the Code of Ethics annually, or as amended.

JFS anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which JFS has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which JFS its affiliates and/or clients, directly or indirectly, have a position of interest. JFS employees and persons associated with JFS are required to follow JFS' Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees JFS and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for JFS' clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of JFS will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of JFS' clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between JFS and its clients.

The clients of Jordan Financial Strategies, LLC may obtain a complete copy of the firm's Code of Ethics and Personal Trading Policy by contacting Kristy Jordan at 303-444-1110.

Item 12 – Brokerage Practices

Jordan Financial Strategies, LLC (JFS) periodically uses research information provided by broker-dealers with whom we conduct business. However, JFS does not have any formal or informal agreements to compensate broker-dealers for the receipt of such research information. JFS, as a matter of practice, does not compensate broker-dealers for third-party research services (known as "soft dollar arrangements") with the use of client commissions. As JFS is in receipt of soft dollar benefits, they are not proportionally allocable to accounts.

JFS does not receive referrals from a broker-dealer or third party.

The Chief Compliance Officer (CCO) of JFS is responsible for identifying and approving broker-dealers to use in executing trades for client accounts. The CCO considers various factors in selecting a broker for JFS, including:

- Financial condition;
- Acceptable record keeping;
- Ability to obtain best price;
- Knowledge of market, securities and industries;
- Commission structure; and
- Reputation and integrity.

JFS uses JFS' investment management service program custodied primarily at TD Ameritrade. Through this program, TD Ameritrade provides both brokerage and custodial services to the majority (currently all) of JFS' clients, although clients may elect for their accounts to be held at another custodian. JFS has chosen TD Ameritrade for its ability to deliver quality execution and record keeping services, among other items. Should JFS trade in securities in which we are uncomfortable with TD Ameritrade's ability to deliver best execution, the CCO will locate a more suitable broker using the factors outlined above. To the extent that clients direct JFS to execute transactions solely through TD Ameritrade, JFS may be unable to achieve the most favorable execution of client transactions, and this practice may cost clients more money. If a client directs JFS to execute transactions through another custodian, it is highly likely that the costs of creating that working relationship and becoming proficient in that new administrative system would create higher fees to the client.

TD Ameritrade Institutional makes available to JFS other services that benefit JFS but may not benefit the clients' accounts directly. Some of these other products and services assist the firm in managing and administering clients' accounts. These include software and other technology that provide access to client account data; facilitate trade execution, provide research, pricing information and other market data, facilitate payment of fees from client accounts, and assist with record keeping and client reporting. TD Ameritrade also makes available to the firm business support services such as consulting, conferences on practice management, information technology, and regulatory compliance and marketing. TD Ameritrade may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third party providing these services to the firm. While a fiduciary, the firm endeavors to act in its clients' best interests, and the firm's recommendation that clients maintain their assets in accounts at TD Ameritrade may be based in part on the benefit to the firm of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by TD Ameritrade, which may create a potential conflict of interest.

Each client's work is treated as a unique situation and the portfolio is created separately from other client accounts to reflect the unique nature of the client. While not a current practice, JFS may choose to have certain affiliated accounts trade in the same securities with client accounts on an aggregated basis when consistent with JFS' obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. JFS will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order. However, JFS does not currently use aggregated trading as JFS does not use model portfolios for client accounts.

Item 13 – Review of Accounts

Review of Financial Planning

At your request an annual, semi-annual or quarterly review of your financial planning issues will be conducted by a financial advisor of Jordan Financial Strategies, LLC. The review process is intended to address necessary plan modifications based on material financial changes, or other changes in your stated needs, goals, and/or objectives. A separate fee may be charged for this review.

Review of Investment Advisory Accounts

As agreed on, annual, semi-annual, quarterly or periodic reviews of your investment advisory accounts will be conducted by Kristy R. Jordan, a financial advisor of Jordan Financial Strategies, LLC. The review process is intended to address necessary plan modifications based on material financial changes, or other changes in your stated needs, goals, and/or objectives.

Your asset allocation should be monitored regularly and rebalanced periodically. In most cases this will not have to be done more often than once a year unless there are substantial movements in the value of one asset class or substantial withdrawals are made. Typically, a portfolio will not skew percentage holdings by more than plus-or-minus five percent between rebalancing sessions. We will not rebalance "just because" the portfolio is skewed between sessions or "because it is time," we will address contributing factors to determine whether a rebalance is warranted. This would include, but not be limited to, factors such as administrative fees, investment fees, and taxes. In addition, if a change in your circumstances or a basic change in the assumptions underlying your asset allocation occurs, it may be necessary to recommend a change in the asset allocation of your portfolio. Please contact us immediately if these changes occur.

A statement reflecting the investments we handle for you will be prepared and mailed to you regularly (either monthly or quarterly) from the institution holding your assets. Statements will detail all transactions, including the contracted Account Fees with Jordan Financial Strategies, LLC. A portfolio performance summary reflecting the investments we have handled for you will be prepared for you regularly and on request or during review sessions. Internet online access to your accounts managed through us is offered for your convenience. Secure access is granted through your internet service provider and is initiated through email.

In computing the market value of any security or other investment in the account, each security listed on a national securities exchange shall be valued, as of the valuation date, at the

closing price on the principal exchange on which it is traded. Any other security or investment in the account shall be valued in a manner determined in good faith by the custodian to reflect fair market value. Clients are encouraged to review and compare statements prepared by the custodian with the portfolio performance summary statements prepared through Jordan Financial Strategies, LLC. JFS uses third party performance summary reporting software and any valuation differences should be insubstantial and should result from a function of rounding differences or differences in accrued dividend treatment on some securities. Both the statements received by the custodian and the summary statements received through JFS should detail positions, account fees, and transactions.

For any assets purchased within the account, the cost basis is the actual purchase price including transaction charges. For any assets transferred into the account, original purchase price is used as the cost basis to the extent such information was submitted by Client to JFS. It is Client's responsibility to advise JFS immediately if the cost basis information is portrayed inaccurately. Statement calculations and figures provided by JFS are for general information purposes and should not be relied upon for tax purposes.

Nothing in the Investment Advisory Agreement shall in any way constitute a waiver or limitation of any rights which client may have under federal or state securities laws (or ERISA, if Client is in a qualified plan under ERISA).

There is no guarantee that your investment objectives will be achieved. Neither JFS nor any employee of JFS shall have any liability for your failure to inform JFS in a timely manner of any material change in your financial circumstances which might affect the manner in which your assets are allocated, or to provide JFS with any information as to your financial status as JFS may reasonably request.

Item 14 - Client Referrals and Other Compensation

It is the current practice of Jordan Financial Strategies, LLC (JFS) to not use solicitors. JFS will not pay cash or non-cash referral fees to affiliated or unaffiliated entities that directly or indirectly solicit any client for, or refer any client to, JFS. This policy does NOT supersede the policy of *de minims* gifts given or received by JFS.

If JFS were to implement an agreement with a third-party solicitor, JFS must receive a signed and dated statement from the client acknowledging receipt of the broker-dealer or other third-party solicitor's required client disclosures before or at the time of entering into an investment management agreement with the client.

JFS will not engage in the following practices with respect to solicitation arrangements:

A. JFS will not enter into solicitation arrangements where we are required to pay the solicitor cash or non-cash referral fees, such as directed brokerage arrangements.

B. JFS will not knowingly pay referral fees to a fiduciary of an ERISA plan in exchange for securing investment management services for such plan, unless the solicitation arrangement is structured to comply with applicable regulations.

Item 15 – Custody

It is the intent of Jordan Financial Strategies, LLC (JFS) to only have custody over client assets to the extent we request the client's custodian to deduct advisory fees directly from client

accounts. The following procedures are designed to help ensure JFS does not inadvertently obtain further custody (other than by the deduction of advisory fees noted above) over client assets:

- A. We will obtain prior written authorization from the client before deducting fees directly from the client's account;
- B. We will not hold client securities in JFS' name or in bearer form;
- C. We will not require clients to prepay greater than \$500 in fees 6 months or more in advance:
- D. Proceeds from the redemption of client securities may not be directed to JFS;
- E. We may not have signatory power over a client's checking or custodial account;
- F. An employee may not serve as trustee over a client's account, unless the client is an immediate family member of the employee, or prior written approval is obtained from the CCO for special circumstances; and
- G. All wires from client custodial accounts to outside (i.e., non-client) accounts must be accompanied by client authorization.

The Use of Qualified Custodians:

- A. All client assets will be held by a qualified custodian, which may include a broker dealer, bank or foreign financial institution.
- B. We will not route original custodial statements to our clients on behalf of a custodian. The custodian should deliver client account statements directly to the client.
- C. We are responsible, within reason, to ensure clients receive custodial statements directly from the custodian on, at a minimum, a quarterly basis. To meet this responsibility, we will receive duplicate copies of our clients' custodial statements.
- D. Custodial accounts will be opened by a client. JFS personnel may assist the client in preparing paperwork for a new custodial account, but the client is required to authorize any new custodial account.

JFS Receipt of Funds or Certificates

- A. Handling of Client Funds
 - (1) We may handle or forward checks clearly made payable to a third party, such as the client's independent custodian.
 - (2) We may not handle or forward any other client check or security certificate received by the firm. All such instruments must be returned to a client within three business days, and may not be forwarded to any other party other than the client or a client representative.

B. Handling of Security Certificates

As discussed in Handling of Client Funds above, we may not physically handle security certificates. We may, however, provide direction to a client in completing the transfer and shipping paperwork to help ensure a security certificate is properly deposited with the client's custodian. In doing so, the client must be physically present and the employee should walk or drive the client to a shipping box, instructing them to drop the envelope in the box. The employee should never physically handle the security certificate.

Clients are encouraged to review and compare statements prepared by the custodian with the portfolio performance summary statements prepared by through Jordan Financial Strategies, LLC. The portfolio performance summary statements are prepared by a third party and delivered through Jordan Financial Strategies, LLC by secured access to the third party's website or manually delivered in meetings.

Item 16 – Investment Discretion

Jordan Financial Strategies, LLC (JFS) receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought and sold. In all cases, however, such discretion is to be exercised in a manner consistent with the investment objectives for the client. While discretionary authority is in place, it is the typical practice (though not required) of JFS to consult with the client before portfolio modifications are implemented.

Jordan Financial Strategies, LLC does not take custody of your assets or funds. For your convenience in implementing investment advisory services, JFS (as a Registered Investment Advisor) maintains relationships with TD Ameritrade and other account holding entities, to provide account services and duplicate statements to JFS and its clients. If you wish to use these services, the companies require you to execute a Limited Power of Attorney giving JFS the authority to instruct the custodian as to trades to be effected in the account.

When selecting securities and determining amounts, JFS observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, JFS' authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made. The principal, Kristy R. Jordan, may also take discretionary control over certain types of investment accounts offered through affiliated companies.

Item 17 – Voting Client Securities

The client retains the right to vote all proxies, which are solicited for securities held in client accounts. Jordan Financial Strategies, LLC and all employees are hereby expressly precluded from voting proxies for securities held in the account and will not be required to take any action or render any advice with respect to the voting of proxies.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about financial condition. Jordan Financial Strategies, LLC (JFS) has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding. We will disclose to our clients any financial condition that is reasonably likely to impair JFS' ability to meet our contractual commitments to our clients.

This brochure does not include a balance sheet for JFS as the firm does not take custody of client funds or securities and does not require prepayment of more than \$500 in fees more than six months in advance of services being provided.

Item 19 – Requirements for State-Registered Advisers / Other Information

On request, clients may receive a full copy of the Jordan Financial Strategies, LLC Privacy Policy, Business Continuity Plan, Code of Ethics and Personal Trading Policy, and Investment Advisory Services Agreement. Copies of the above disclosures and Client Agreements for Geneos Wealth Management, Inc. and TD Ameritrade are available, on request.

Item 1 – Cover Page Information for Part 2B of From ADV - Brochure Supplement

Jordan Financial Strategies, LLC A Registered Investment Advisor Kristy R. Jordan, Investment Adviser Representative 891 Garrison Street, Lakewood, CO 80215 303-444-1110 kj@krjordan.com

This brochure contains information from Part 2B of Form ADV as required by the State of Colorado. Information contained in this brochure regarding the qualifications and business practices of Kristy R. Jordan, as an Investment Adviser Representative, has not been approved or verified by the SEC or any federal or state government agency.

If you have any questions about the contents of this brochure, please use the contact information above. Additional information about Jordan Financial Strategies, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Updated June 30, 2011.

Item 2 – Educational Background and Business Experience

Refer to Item 4 in the ADV Part 2A.

Item 3 – Disciplinary Information

Refer to Item 9 in the ADV Part 2A. Kristy R. Jordan has no information applicable to this item.

Item 4 – Other Business Activities

Refer to Item 10 in the ADV Part 2A.

Item 5 – Additional Compensation

Refer to Item 14 in the ADV Part 2A.

Item 6 – Supervision

Refer to Item 4 in the ADV Part 2A.

Item 7 – Requirements for State-Registered Advisers

Refer to Item 9 in the ADV Part 2A. Kristy R. Jordan has no information applicable to this item.